RCRA INTERIM STATUS INSPECTION FORM

Facility Name: GMC-BOC LORDSTOWN
Address: 2300 HALLOCK-YOUNG RD P.O. 1406
WARREN, OHIO 44482
County: TRUMBULL
Facility Contact: BEN KRISTAN, JULIE BLACKBURN, KAREN TRESSLER
Inspector(s)Name(s): SHERRY SLONE, GREG TAYLOR

Date of Inspection 1/30/90 & 2/2/90
HWFB #: 02-78-0356
USEPA ID #: OHD 020 632 998
Facility Phone #: 216-824-5572
Facility Contact Phone#:
Safety Equipment #: SAFETY GLASSES, STEEL TOED BOOTS

STATUS
Cond. Ex. SQG___ SQG___ Generator ✓ Transporter___ Treatment___ Storage ✓ Disposal___

ACTIVITIES
Containers ✓ Tanks ✓ Surface Impoundments___ Incineration/Thermal treatment___
Waste pile___ Land treatment___ Landfill___ Groundwater monitoring___
Used oil burner___ Hazardous waste fuel burner/blender___

	Y/N/NA	REMARK #
1. Does the facility produce "discarded materials" as defined in 3745-51-02(A)?	Y	
2. Are they :		
a. Abandoned(disposed;incinerated;accumulated, stored, or treated prior to disposal)?	Y	
b.Recycled?	N	
c. Inherently waste-like?(F020,F021,F022,F023,F026,F028)?	N	
3. If recycled or accumulated, treated or stored before recycling, is the waste:		
a. Used in a manner constituting disposal?	NA	
b. Burned for energy recovery?		
c. Reclaimed? (Refer to Table 1 of 3745-51-02)		
d. Accumulated speculatively?		
4. Is the material recycled by being:		
a. Used or reused as an ingredient in an industrial process to make a product without prior reclamation?		
b. Used as an effective substitute for commercial products?		
c. Returned to the original process from which it was generated without prior reclamation as a substitute for a raw material feedstock?		

	Y/N/NA	REMARKS
re Land Disposal Restricted (LDR) wastes generated? If so, complete ppropriate LDR checklist.	Y	
. Has the facility submitted a Part A application to Ohio EPA in accordance with OAC 3745-50-40?	Y	
. If yes, is it complete and accurate and does it contain all information specified in OAC 3745-50-41, -42, -43?	N	
. If not accurate, has a Permit Change Request (PCR) been submitted in accordance with 3745-50-51? If yes, what date was the PCR submitted.	Y	#1
. Is the facility operating in compliance with the terms and conditions of its HWFB permit?	Y	#2
0. Has the facility submitted a Part B?	Y	
1. Was advance notice of the inspection given? If so, how far in advance?	Y	1WK

#1. 10.13.87 last Part A submitted. Includes 61,875 gallons container storage and 21500 gallons of tank storage. Waste codes include D001, D002, D005-D009 and F001, F002, F003, F005.

#2. Yes, except the processes and waste codes have been changed

REMARKS. GENERAL INFORMATION.

clude list of wastes being generated/managed at the site and a brief description of site tivity and waste handling.

This facility assembles passenger cars and vans. Current hazardous waste storage units include a drum storage pad and two hazardous waste storage tanks. The following waste streams are currently generated:

1. Purge thinner (D001, F003, F005) - xylene → pipelines from van plant to tank #14 outside
2. Clean up thinners and scrap paint (D001, F003, F005) → drums → tank → pipelines from passenger plant → tank #1 inside
3. Fly Ash (D006, D008) → drums in SW Drain Bldg. → Envirosafe
4. ELPO Paint Filters (D008) → drums next to paint lines in van and pass. plant
5. ELPO Paint Sludge (D008) generated once per year → drums from van and pass. plant
6. Rags (D001, F002, F003, F005) - alcohol, trichloroethane, toluene MEK, MS → drums from passenger plant
7. Chlorinated Solvents (F002) parts cleaner used by pipe fitters in CMB and wipe solvent used in body shop in pass 3 - plant. → drums
8. Adhesives and sound deadener (D001) scrap from production in passenger plant → drums
9. Dynitron switches (D009) mercury tubes or thermostats from production equipment in the body shop (2 drums now of this waste)
10. Petroleum Naptha (D001) parts cleaner from Safety Klee approximately 18 stations from passenger and van plant and CMB.
11. Caustic Sludge (D002) from caustic dip tank in pass. plant → drums [illegible] 3 to 6 months tank is cleaned

OAC 3745-52 GENERATOR REQUIREMENTS (40 CFR Part 262)	Y/N/NA	REMARK #
1. Have the wastes generated at this facility been evaluated as required under 3745-52-11 (262.11)?	Y	
2. Does this facility generate any hazardous wastes that are excluded from regulation under 3745-51-04 (261.4)?	N	
3. Does this facility have waste or waste treatment equipment that is excluded from regulation because of totally enclosed treatment [3745-65-01] (265.1(c)(9)) or via operation of an elementary neutralization unit and/or wastewater treatment unit [3745-65-01] (265.1(c)(10))?	N	
4. Is the generator classified as a Small Quantity Generator (SQG) or conditionally exempt SQG? If so, complete appropriate checklist.	N	
5. Does the generator meet the following requirements with respect to the preparation, use and retention of the hazardous waste manifest:		
a. All hazardous wastes shipped off-site have been accompanied by a completed manifest using the most recently revised USEPA form 8700-22?	N	#1 *
b. The manifest form used contains all the information required by 3745-52-20 (262.20) and the minimum number of copies required by 3745-52-22 (262.22)?	N	#1 *
c. The generator has designated at least one permitted disposal facility and has/will designate an alternate facility or instructions to return waste in compliance with 3745-52-20(C)(D)(E) (262.20)?	Y	
d. Prepared manifests have been signed by the generator and initial transporter in compliance with 3745-52-23(A)(1&2) (262.23)?	Y	
e. The generator has complied with manifest exception reporting requirements in 3745-52-42 (262.42(a))?	NA	
f. Signed copies of all hazardous waste manifests and any documentation required for Exception Reports are retained for at least 3 years as required by 3745-52-40 (262.40)?	Y	

#1. Manifests 53797 and 53801, dated 11-24-89, did not have block I., waste code, completed on the Generator copy. Manifest 21781 did not contain a complete TSD facility address with city and state.

	Y/N/NA	REMARK #
Does the generator meet the following hazardous waste pre-transport requirements:	Y	
a. Prior to offering hazardous wastes for transport off-site, the waste material is packaged, labeled, and marked in accordance with applicable DOT regulations [3745-52-30, 3745-52-31, and 3745-52-32] (262.30, 262.31, 262.32)?	Y	
b. Prior to offering hazardous waste for transport off-site, each container with a capacity of 110 gallons or less is affixed with a completed hazardous waste label as required by 3745-52-32 (262.32)?	Y	
c. Prior to offering hazardous wastes for transport off-site, the generator meets requirements for properly placarding or offering to properly placard for the initial transporter of the waste material in compliance with 3745-52-33 (262.33)?	Y	
Does the generator import or export hazardous waste?	N	
If so, are the wastes handled in accordance with the requirements of 3745-52-50 (262.50)?	NA	
3. If the generator elects to accumulate hazardous waste on-site in containers or tanks for 90 days or less without a hazardous waste facility installation and operation permit as provided under 3745-52-34 (262.34), are the following requirements with respect to such accumulation met:		
a. The containers or tanks are clearly marked with the words "Hazardous Waste"?	Y	
b. The date that accumulation began is clearly marked on each container?	Y	
c. If the waste is accumulated in containers, the generator is complying with OAC 3745-66-70 to 3745-66-77? Complete Management of Containers checklist.	Y	

	Y/N/NA	REMARK #
d. If the waste is accumulated in tanks, the generator is complying with OAC 3745-66-90, to 3745-66-992 except OAC 3745-66-97(C) and 3745-66-991? Complete Storage and Treatment in Tanks checklist.	N	
e. If the generator accumulates waste at or near the point of generation which is under the control of the operator of the process generating the waste as allowed by 3745-52-34(C) are the following requirements met:		
1. Quantities of waste accumulated do not exceed 55 gallons at any time?	Y	
2. Quantities of acutely hazardous waste accumulated do not exceed 1 quart at any one time?	Y	
3. If the generator is accumulating hazardous waste in accordance with e.1 or e.2, above, has the generator marked the containers with words "Hazardous Waste" or with other words identify the contents of the container and is the generator complying with OAC 3745-66-71, 3745-66-72, 3745-66-73(A), 3745-66-76, and 3745-66-77?	Y	
4. If the generator accumulates hazardous wastes in excess of the amounts listed in either e.1 or e.2, above, did the generator comply with 3745-52-34(A) (262.34(a)) within three (3) days and mark the container holding the excess accumulation with the date the excess accumulation began accumulating?	Y	
9. Has the generator accumulated hazardous wastes in excess of ninety (90) days?	Y	
10. Has the generator been granted an extension by the Director/ Regional Administrator for accumulation in excess of ninety (90) days?	N	
11. Has the generator treated, stored, disposed of, transported or offered for transportation hazardous waste without having obtained a USEPA identification number from the Administrator as required under 3745-52-12 (262.12)?	N	

		Y/N/NA	REMARK #
2	Does the generator provide a Personnel Training Program in compliance with 3745-65-16(A)(B)(C) (265.16) including instruction in safe equipment operation and emergency procedures, training new employees within 6 months and providing an annual training program refresher course? [3745-52-34(A)(4)] (262.34)	Y	
3.	Does the generator keep all of the records required by 3745-65-16(D)(E) (265.16) including written job titles, job descriptions and documented employee training records? [3745-52-34(A)(4)] (262.34)	Y	
4.	Has the generator filed annual reports on or before March 1st of the next calendar year as required by 3745-52-41?	Y	
5.	Does the generator comply with the applicable requirements for owners or operators of hazardous waste facilities? Complete "Preparedness and Prevention" and "Contingency Plan and Emergency Procedures" checklists.	N	

REMARKS, GENERATOR REQUIREMENTS

mall Quantity Generator, Conditionally Exempt SQG

	Y/N/NA	REMARK #
Have the wastes generated at this facility been evaluated as required under 3745-52-11 (262.11)?	NA	
Does the generator produce <100 kg of waste per month? (conditionally exempt SQG)		
Does the conditionally exempt SQG generate acutely hazardous waste in quantities exceeding those specified in 3745-51-05(E), 3745-51-05(F)		
Does the conditionally exempt SQG ensure delivery to an off-site permitted TSD?		
5. Do quantities of hazardous waste accumulated on-site at any one time exceed 1000 kg - or does the generator produce between 100 and 1000 kg of hazardous waste per month - (SQG)? If so, complete items 6-21.		

SQG

6. Have the wastes generated at this facility been evaluated as required under 3745-52-11 (262.11)?		
7. Do quantities of hazardous waste accumulated on-site ever exceed 6000 kg/s? (If so, TSD standards apply. Complete application TSD checklists.) [3745-52-34(D) and (F)] (262.34(d) and 262.34(f))		
8. If wastes are stored in containers, are wastes placed in containers in compliance with 3745-66-70 to 3745-66-77 except 3745-66-76? [3745-52-34(D)(2)] (262.34(d)(2) Complete Management of Containers checklist.		
9. If wastes are stored in tanks, are wastes stored in tanks in compliance with 3745-66-992? Complete Accumulation in Tanks for SQG's checklist.		

		Y/N/NA	REMARK #
10.	Is the date accumulation began clearly marked on each container? [3745-52-34(A)(2)] (262.34(a)(2))	_____	_____
11.	Is each container or tank clearly marked with the words "Hazardous Waste"? [3745-52-34(A)(3)] (262.34(a)(3))	_____	_____
12.	Does the generator comply with the "Preparedness and Prevention" requirements for owners and operators of hazardous waste facilities? [3745-52-34(D)(4)] (262.34(d)(4)) Complete Preparedness and Prevention checklist.	_____	_____
13.	Is an emergency coordinator available at all times? [3745-52-34(D)(5)(a)] (262.34)	_____	_____
14.	Has the following information been posted by the telephone? [3745-52-34(D)(5)(b)] (262.34)		
	a. Name and telpehone number of emergency coordinator.	_____	_____
	b. Location of fire and spill control equipment.	_____	_____
	c. Telephone number of local fire department.	_____	_____
15.	Have emergencies been reported to the National Response Center? [3745-52-34(D)(5)(d)] (262.34)	_____	_____
16.	Has the generator accumulated hazardous wastes in excess of 180 days (or 270 days if the waste must be transported more than 200 miles)? [3745-52-34(E)] (262.34(e))	_____	_____
17.	Has the generator been granted an extension by the Director/ Regional Administrator for accumulation in excess of 180 days?	_____	_____
18.	Have waste shipments been accompanied by a completed manifest? [3745-52-23] (262.23) If no, is the waste being reclaimed under a contractual agreement in accordance with OAC 3745-52-20(F) (262.20(f))?	_____ _____	_____ _____
19.	Are signed copies of manifests retained for at least 3 years? [3745-52-40] (262.40)	_____	_____

		Y/N/NA	REMARK #
20.	Has the generator treated, stored, disposed of, transported or offered for transportation hazardous waste without having obtained a USEPA identification number from the Administrator as required under 3745-52-12 (262.12)?	_____	_____
21.	Are all employees thorough familiar with proper handling and emergency procedures? [3745-52-34(D)(4)(c)] (265.34(d)(4)(iii))	_____	_____

Accumulation in Tanks for Generators of between 100 and 1000 kg/mo (SQG)

Applicability: All of the items on this checklist apply to small quantity generators who accumulate hazardous waste in tanks for less than 180 days (or 270 if must ship >200 miles) and do not accumulate over six thousand kg on-site at any time.

		Y/N/NA	REMARK #
1.	Does the small quantity generator comply with all of the following operating requirements? [3745-66-992(B)](265.201(b))	NA	
	a. The treatment or storage complies with 3745-66-17(B) (265.17(b).		
	b. The wastes or treatment reagents are not placed in a tank if they could cause the tank or its inner liner to rupture, leak, corrode or fail before its intended life.		
	c. The uncovered tanks are operated with 2 feet of freeboard unless the tank is equipped with a containment structure, a drainage control system, or a diversion structure with a capacity that equals or exceeds the volume of the top 2 feet of the tank.		
	d. When waste is continuously added, the tank has a waste feed cut-off or bypass system.		
2.	Has the small quantity generator inspected the following: [3745-66-992(C)] (265.201(c))		
	a. The discharge control equipment (once each operating day)		
	b. The data from monitoring equipment (once each operating day)		
	c. The level of the waste in the tank (once each operating day)		
	d. The construction material (weekly)		
	e. The area surrounding the tank (weekly)		
3.	Has the small quantity generator, upon closure of the tank, removed all hazardous waste from the tank system. [3745-66-992(D)] (265.201(d))		

		Y/N/NA	REMARK #
4.	Has the SQG complied with all of the following requirements: [3745-66-992(E)] (265.201(e))	_____	_____
	a. The waste has not been placed in the tank unless it is treatmed before or immediately after placement to make it non-reactive or not ignitable and 3745-17(B) (265.17(b) is complied with; and	_____	_____
	b. The waste is stored or treated so as to protect it from conditions which will cause the waste to ignite or react; and	_____	_____
	c. N.F.P.A.C.L. Code (1977 or 1981) buffer zone requirements are complied with.	_____	_____
5.	Has the SQG complied with the following? 3745-66-992(F)(265.201(f))	_____	_____
	a. Incompatible wastes are not placed in the same tank unless 3745-65-17(B) (265.17(b) is complied with.	_____	_____
	b. Waste is not placed in an unwashed tank which previously held incompatible wastes unless 3745-65-17(B) (265.17(b) is complied with.	_____	_____

AC 3745-53 TRANSPORTER REQUIREMENTS (40 CFR PART 263)	Y/N/NA	REMARK #
1. Has the entity registered with the Public Utilities Commission of Ohio as a transporter or hazardous waste? [3745-53-11] (263.11)	NA	
What is the entity's PUCO Number?		
2. Has the transporter notified USEPA and received a USEPA ID number prior to transporting hazardous waste?		
3. Has the transporter accepted hazardous wastes for transport only when the waste was accompanied by a manifest prepared by the generator in accordance with 3745-52, (Part 262, Subpart B)? [3745-53-20(A)] (263.30)		
4. Has the transporter signed the manifest as required by 3745-53-20 and carried the manifest with the waste shipment as required by 3745-53-20(C) (263.20(c))?		
5. Upon delivery of the hazardous waste to the next transporter or the designated facility, has the transporter signed the manifest as required under 3745-53-20(D)(1) and retained a signed copy for at least 3 years? [3745-53-22(A)] (263.20 and 263.22)		
6. Has the transporter delivered the entire quantity of waste accepted from the generator in accordance with manifest instructions?		
In cases where this was not possible, has transporter contacted the generator for further instructions and revised the manifest accordingly? [3745-53-21(A)(B)] (263.21)		
7. If hazardous waste has been delivered to rail transporters or water transporters, has the original transporter complied with the manifest handling requirements of 3745-53-20(E)(F) (263.20(e)(f)?		

	Y/N/NA	REMARK #
If hazardous waste has been shipped out of the country, has the transporter retained signed copies of the manifest for at least 3 years indicating that the waste left the U.S.A.? [3745-53-22(D)] (263.22(d))	_____	_____
Has the transporter ever had a discharge of hazardous waste during the time that the waste was under his control?	_____	_____
a. Was immediate action taken? [3745-53-30(A)] (263.30(a))	_____	_____
b. Were all of the notifications required by 3745-53-30(C) (263.30(c)(d)) made?	_____	_____
c. Was the discharge cleaned up as required by 3745-53-31 (263.31)?	_____	_____
Does the transporter store hazardous wastes temporarily while they are in transit?	_____	_____
Are manifested wastes stored for 10 days or less and do they remain properly DOT packaged during storage? [3745-53-12] (263.12)	_____	_____

TE: TEMPORARY STORAGE IN STATIONARY TANKS IS NOT PERMITTED UNDER TRANSFER FACILITY QUIREMENTS AND SUCH STORAGE REQUIRES A RCRA PERMIT AND IS SUBJECT TO INTERIM STATUS QUIREMENTS FOR STORAGE FACILITIES. ANY TYPE OF STORAGE BY THE TRANSPORTER WHICH IS NOT ECIFICALLY AUTHORIZED UNDER OAC 3745-53-12 (263.12), TRANSFER FACILITY REQUIREMENTS, IS BJECT TO FULL RCRA REGULATION.

Does the transporter import hazardous waste into the United States?	_____	_____
Does the transporter mix hazardous wastes of different US DOT descriptions by placing them into a single container?	_____	_____

TE: A TRANSPORTER THAT IMPORTS HAZARDOUS WASTES OR MIXES WASTES AS DEFINED IN 3745-53-(C) (263.10(c)) BECOMES A GENERATOR AND IS SUBJECT TO THE REQUIREMENTS OF 45-52(40 CFR Part 262).

		Y/N/NA	REMARK #
If the transporter received SQG wastes for transport pursuant to a reclamation agreement, was the following information recorded in a log or shipping paper carried with the shipment? [3745-53-20(H)] (263.20(h))			
a.	Name, address and USEPA ID # of SQG	____	____
b.	Quantity of waste	____	____
c.	DOT required shipping information	____	____
d.	Date waste accepted	____	____
e.	Were records related to the shipments maintained for at least 3 years following expiration of the reclamation agreement	____	____

REMARKS, TRANSPORTER REQUIREMENTS

AC 3745-58 HAZARDOUS WASTE BURNED FOR ENERGY RECOVERY (40 CFR PART 262, SUBPART D)

	Y/N/NA	REMARK #
Does the facility:		
a. generate hazardous waste fuel? (Complete Generator Requirements checklist	NA	
b. transport hazardous waste fuel? (Complete transporter regulations checklist)		
c. market hazardous waste fuel? (Subject to 3745-58-45)(266.34)		
d. burn hazardous waste fuel? (Subject to 3745-58-46(266.35)		

arketer/Burner Regulations

. Has the marketer/burner filed a Notification of Hazardous Waste Activity Form with the USEPA? [3745-58-45(B)] (266.34(b); [3745-58-46(B)] (266.35(b))	NA	
. Is hazardous waste fuel stored in containers or tanks?		
a. Is the storage for more than 90 days? [3745-58-45(C)] (266.34(c)) [3745-58-46(C)(D)(E)] (266.35(c))		
b. If 3.a. is yes, did the marketer/burner file a Part A Application for interim status as a storage facility by May 29, 1986?		

NOTE: STORAGE OF HAZARDOUS WASTE FUELS IN CONTAINERS OR TANKS IS SUBJECT TO REGULATION UNDER OAC 3745-52-34 AND OAC 3745-65 THROUGH 3745-69 (262.34) AND SUBPARTS A-L OF 265, AND 270. COMPLETE APPLICABLE CHECKLIST(S) FOR G/TSD/CONTAINERS/TANKS.

For Marketers Only

. Have shipments of hazardous waste fuel initiated by the marketer been accompanied by completed manifests? [3745-58-45(D)] (266.34(d))	NA	

		Y/N/NA	REMARK #
5	Has the marketer obtained written notice before initiating the first shipment certifying that receipients of his hazardous waste fuel have notified USEPA of their hazardous waste activity and will burn hazardous waste fuel only in boilers or industrial furnaces? [3745-58-45(E), 3745-58-46(F)] (266.34(e))		
6.	Has the marketer provided notice to companies from which he will receive hazardous waste fuel that he has notified USEPA of his hazardous waste activity [3745-58-45(F)] (266.34(e))		
7.	Are copies of the required certification maintained for 3 year by both the marketer and receiving burner? [3745-58-45(G) (266.34(f))		
8.	Are other applicable recordkeeping requiremetns under OAC Chapters 3745-52, 3745-54, and 3745-65 (Parts 262, 264, and 265) maintained by the marketer?		
For Burners Only			
9.	Is hazardous waste burned in appropriate devices as defined by 3745-58-42(B) (266.31(b))?	NA	
10.	Had the burner provided a one-time written and signed notice to the marketer certifying that:		
	a. the burner has notified USEPA of its waste-as-fuel activities?		
	b. the burner will burn in a boiler or furnace identified in 3745-58-42(B) (266.31(b)?		
11.	Are copies of required certification maintained for 3 years by both the marketer and receiving burner? [3745-58-46(G)] (266.35(e))		
12.	Are other applicable recordkeeping requirements under parts OAC 3745-54 through 3745-65, through 3745-69 and 3745-56-20 through 3745-56-59 and 3745-67-20 through 3745-67-58 (262, 264, and 265) maintained by the marker/burner?		

3745-58 USED OIL BURNED FOR ENERGY RECOVERY (40 CFR PART 266M SUBPART E)

	Y/N/NA	REMARK #
Is used oil or used oil fuel being burned for energy recovery in a boiler or industrial furnace? 3745-58-50(A)	N	
Does the used oil contain more than 1000 ppm total halogens? (If yes, is it presumed to be hazardous waste fuel under 3745-58 This is a rubuttable presumption(Part 262, Subpart D)? [3745-58-50(C)] (266.40(c))		
Is the used oil a hazardous waste solely because it:		
a. Exhibits a characteristic identified under 3745-51 (Part 261, Subpart C)? [3745-58-50(C)] (266.40(d))		
b. Contains hazardous waste generated by Conditionally Exempt Small Quantity Generator's only? [3745-58-50(D)](266.40(d))		
If either 3.a. or 3.b. is yes, the used oil is regulated as a used oil not a hazardous waste fuel.		
Is the used oil classified as "off-specification" due to exceedances of any of the following allowable levels of constituents? [3745-58-50(E)] (266.40(e))		

		Allowable Level		
a.	Arsenic	5 ppm maximum		
b.	Cadmium	2 ppm maximum		
c.	Chromium	10 ppm maximum		
d.	Lead	100 ppm maximum		
e.	Flash Point	100 F minimum		
f.	Total Halogens	4,000 ppm maximum		

If the generator/marketer claims that used oil meets/exceeds specification, does the generator/marketer have analyses of used oil documenting that it meets/exceed specification? [3745-58-53(b)(1)] (266.43(b)(1)		

		Y/N/NA	REMARK #
5.	If the marketer is handling specification used oil, does he/she maintain an operating log containing the following information: [3745-58-53(B)(7)] (266.43(b)(6))		
	a. Name and addrress of facility receiving the shipment?	_____	_____
	b. Date of shipment or delivery?	_____	_____
	c. Cross-reference to the record of used oil analysis?	_____	_____
7.	Are used oil analyses and the operating log kept for a minimum of 3 year?	_____	_____

The following questions apply only to marketers/burners of <u>off-specification</u> used oil fuel:

8.	Has the marketer/burner filed a Notification or Re-notification of Hazardous Waste Activity with the USEPA? [3745-58-53(B)(3)], (266.43(b)(3) and [3745-58-54(B)], (266.44(b))	_____	_____
9.	Has the burner of off-specification usedoil notified USEPA of his/her used oil management activities (except for oil-fire space heaters described under 3745-58-51(B)(2)(c) (266.41(b)(2)(iii)? [3745-58-54(B)] (266.44(b))	_____	_____
10.	When the marketer initiates a shipment of off-specification used oil, has he/she prepared and sent the receiving facility an invoice containing the following information: [3745-58-53(B)(4)] (266.43(b)(4))		
	a. An invoice number?	_____	_____
	b. The marketer's name, address, and USEPA I.D. No.?	_____	_____
	c. The receiving facility's name, address and USEPA I.D. No.?	_____	_____
	d. The quantity of off-specification used oil delivered?	_____	_____
	e. The date(s) of shipment or delivery?	_____	_____

		Y/N/NA	REMARK #
f.	The statement "This used oil is subject to Ohio EPA regulation under Rules 3745-58-50 to 3745-58-54 of the Ohio Administrative Code"?	_____	_____
1.	Prior to initiating the first shipment of off-specification used oil, has the marketer obtained written notice certifying that recipients have notified USEPA (and if a burner will burn only in industrial furnaces or boilers)? [3745-58-53(B)(5)] (266.43(b)(5))	_____	_____
2.	Before accepting shipments of off-specification used oil from other marketers, has the marketer certified that he/she has notified USEPA of his marketing activity? [3745-58-53(B)(5)] (266.43(b)(5))	_____	_____
13.	Are copies of certifications, invoices and analyses maintained for 3 years? [3745-58-53(B)] (266.43(e)(b)(6)(ii)) and [3745-58-54(F)] and (266.44(e))	_____	_____
14.	Has the burner certified to marketers from who he/she receives off-specification oil that he/she has a USEPA I.D. No. and is in compliance with the prohibitions of 266.41(b)? [3745-58-54(C)] (266.44(c)	_____	_____

AC 3745-58 RECYCLEABLE MATERIALS UTILIZED FOR PRECIOUS METALS RECOVERY
gold, silver, platinum, paladium, irridium, osmium, rhodium, ruthenium)
40 CFR Part 266, Subpart F)

	Y/N/NA	REMARK #
Does the person:		
a. Generate any recylcable materials noted above?	NA	
b. Transport any recycleable material noted above? (subject to 3745-53-20 and 3745-53-21) (263.20 and 263.21)		
c. Store any recycleable material noted above? (subject to 3745-65-71 and 3745-65-72 (265.71 and 265.72) [3745-58-60(B)(2)] (266.70(b)(2))		
Has the person notified USEPA under Section 3010 of RCRA regarding generation, transportation, or storage activities? [3745-38-60(B)(2)] (266.70(b)(2))		
Does a person who stores recycleable materials, keep records showing the volume of materials stored at the beginning of the year, the amount of materials generated or received during the year, and the volume of materials remaining at the end of the year [3745-58-50(C)] (266.70(c))		
Do records indicate facility speculatively accumulates the materials?		
a. If yes, the facility is subject to 3745-52 to 3745-69 except Chapter 3745-58 and 3745-44 [3745-58-60)] (266.70(d))		

AC 3745-58-70 SPENT LEAD ACID BATTERIES BEING RECLAIMED 40 CFR 266. SUBPART G

	Y/N/NA	REMARK #
Does the facility store spent batteries before reclaiming them?	N	
If yes:		
a. Has the facility notified USEPA under Section 3010 of RCRA?		
b. Has the facility complied with: applicable provisions of Chapters 3745-55 and 3745-66, Rules 3745-56-20 to 3745-56-59 and 3745-67-20 to 3745-57-57, all provisions of Chapter 3745-54 and 3745-65 except Rules 3745-54-13 and 3745-65-13, 3745-54-71 and 3745-65-71 and 3745-54-72 and 3745-65-72, and all applicalbe provisions of Rule 3745-50-44? [3745-58-70(B)] (266.80(b))		

OAC 3745-65-et seq. GENERAL FACILITY STANDARDS (40 CFR Part 265, SUBPART B)

		Y/N/NA	REMARK #
1.	Does the owner/operator (o/o) have a detailed chemical and physical analysis of the waste material containing all of the information which must be known to properly treat or store the waste as required by 3745-65-13(A)(1) (265.13(a))?	Y	
2.	Does o/o have a written waste analysis plan which describes analytical parameters, test methods, sampling methods, testing frequency and responses to any process changes that may affect the character of the waste. [3745-65-13(B)] (265.13(b))	Y	
3. a.	Would physical contact with the waste structures or equipment injure unknowing/unauthorized person or livestock entering the facility? [3745-65-14(A)(1)] (265.14(a)(1))	Y	
b.	Would disturbance of the waste cause a violation of the hazardous waste regulations? [3745-65-14(A)(2)] (265.14(a)(2))	Y	

IF BOTH 3A AND 3B ARE NO, MARK QUESTIONS 4 AND 5 NOT APPLICABLE.

4.	Does the facility have -		
a.	A 24-hour surveillance system, or	U	
b.	An artificial or natural barrier and a means to control entry at all times [3745-65-14(B)(2)(a and b)] (265.14(b)(2))	U	
5.	Does the facility have a sign "Danger-Unauthorized Personnel Keep Out" at each entrance to the active portion of the facility and at other locations as necessary. [3745-65-14(C)] (265.14(c))	U	
6. a.	Has the o/o developed and followed a comprehensive, written inspection plan and documented the inspections, malfunctions and any remedial actions taken in an operating record log which is kept for at least three years. [3745-65-15] (265.15)	N	#1

#1. The hazardous waste drum storage pad inspection form needed separate columns for "Observations" and "Action Taken". (This was corrected by 2.2.90.) The inspection log did not document that secondary containment and ancillary piping for tanks #1 and #14 is being inspected daily. The tank inspection records need an extra column to describe deficiencies.

	Y/N/NA	REMARK #
b. Are areas subject to spills (i.e., loading and unloading areas, etc.) inspection daily when in use and according to other applicable regulations when not in use. [3745-65-16(B)(4)] (265.15(b)(4))	N	#1
Has the o/o provided a Personnel Training Program in compliance with 3745-65-16(A)(B)(C) including instruction in safe equipment operation and emergency response procedures, training new employees within 6 months and providing an annual training program refresher course? (265.16(a)(b)(c))	Y	
Does o/o keep all records required by 3745-65-16(D)(E) including written job titles, job descriptions and documented employee training records? (265.16(d)(e))	Y	
If Ignitable, Reactive or incompatible wastes are handled, does the facility meet the following requirements? [3745-65-17] (265.17)		
a. Protection from sources of ignition.	Y	
b. Physical separation of incompatible waste materials.	Y	
c. "No Smoking" or "No Open Flames" signs near areas where Ignitable or Reactive wastes are handled.	Y	
d. Comingling of waste materials is done in a controlled, safe manner as prescribed by 3745-65-17(B) (265.17(b)	NA	

#1. Tank #4 - visible spillage on ground.

OAC 3745-65 PREPAREDNESS AND PREVENTION (40 CFR PART 265 SUBPART C)

		Y/N/NA	REMARK #
1.	Is the facility operated to minimize the possibilty of fire, explosion, or non-planned release of hazardous waste? [3745-65-31] (265.31)	N	#1, #3
2.	Has there been a fire, explosion or non-planned release of waste at the facility?	Y	#1
	a. If yes, has the contingency plan been implemented?	Y	#1
3.	If required due to actual hazards associated with the waste, does the facility have the following equipment: [3745-65-32(A)(B)(C)(D)] (265.32)		
	a. Internal alarm system?	Y	
	b. Access to telephone, radio or other device for summoning emergency assistance?	Y	
	c. Portable fire control equipment?	Y	
	d. Water of adequate volume and pressure via hoses, sprinkler, foamers or sprayers?	Y	
4.	Is all required spill control and decontamination equipment, fire and communications equipment tested and maintained as necessary? [3745-65-33] (265.33)	Y	
5.	If required due to the actual hazards associated with the waste, do personnel have immediate access to an emergency communication device during times when hazardous waste is being physically handled? [3745-65-34] (265.34)	Y	
6.	If required due to the actual hazards associated with the waste, is adequate aisle space to allow unobstructed movement of emergency or spill control equipment maintained? [3745-65-35] (265.35)	Y	
7.	If required due to the actual hazards associated with the waste, has the facility attempted to make appropriate arrangements with local authorities to familiarize them with the possible hazards and the facility layout? [3745-65-37(A)] (265.37(a))	N	#2

#1. Release of hazardous waste by Tank #14, reportedly from transfer operations.

#2. Contingency plan has not been completely updated to show all ≤90 day storage areas and this updated plan has not been sent to all local authorities.

#3. Spill equipment is needed near paint mix room and near the alcohol wipe operation.

	Y/N/NA	REMARK #
3. Where state or local emergency service authorities have declined to enter into any proposed special arrangements or agreements, has the refusal been documented. [3745-65-37(B)] (265.37(b))	N/A	

C 3745-65 CONTINGENCY PLAN AND EMERGENCY PROCEDURES (40 CFR PART 265 SUBPART D)

		Y/N/NA	REMARK #
	Does the o/o have a written Contingency Plan designed to minimize hazards from fire, explosions or unplanned releases of hazardous wastes which contains the following components for the facility? [3745-65-52(A)(B)(C)(D)(E)] (265.52):		
a.	Actions to be taken by personnel in the event of an emergency incident?	Y	
b.	Arrangements or agreements with local or state emergency authorities?	Y	
c.	Names, addresses and telephone numbers of all persons qualified to act as emergency coordinator?	Y	
d.	A list of all emergency equipment including location, physical description and outline of capabilities?	N	#3
e.	If required due to the actual hazards associated with the waste handled, an evacuation plan for facility personnel? [3745-65-52(F)] (265.52(f))?	N	#1
.	Is a copy of the Contingency Plan and any plan revisions maintained on-site and has it been submitted to all local and state emergency service authorities that might be required to participate in the execution of the plan? [3745-65-53(A)(B)] (265.53)	N	#2
.	Is the plan revised in response to rule changes, facility, equipment and personnel changes or failure of the plan? [3745-65-54] (265.54)	N	#2 #3
.	Is an emergency coordinator who is familiar with all aspects of site operation and emergency procedures who has the authority to implement all aspects of the Contingency Plan designated at all times (on-site or on-call)? [3745-65-56(A-J)] (265.56)	Y	
5.	If an emergency situation has occurred, has the emergency coordinator implemented all or part of the Contingency Plan and taken all of the actions and made all of the notifications deemed necessary under 3745-65-56(A-J). (265.56(a-j))	NA	

#1. Need an evacuation plan for <90 storage areas in the maintenance building.

#2. An updated Contingency Plan that fully addresses all <90 day storage areas has not been sent to all local and state emergency service authorities. (See comment #2, page 25.)

#3. The <90 day storage areas, which have been added, need more specific locations defined &/or need to be identified on maps of the buildings. The list of emergency equipment, its location, and outline of the equipment capabilities needs to be included for each <90 day storage area.

AC 3745-65 MANIFEST SYSTEM/RECORDS/REPORTING (40 CFR PART 265, SUBPART E)

O[illegible] THE FOLLOWING REQUIREMENTS ARE APPLICABLE TO BOTH ON-SITE AND OFF-SITE TREATMENT, [illegible]AGE AND DISPOSAL FACILITIES.

		Y/N/NA	REMARK #
.	Does the o/o maintain a written operating record at the facility as required by 3745-65-73(A) (265.73) which contains the following information:		
a.	Description and quantity of each hazardous waste treated, stored or disposed of within the facility and the date and method pertinent to such treatment, storage or disposal? [3745-65-73(B)(1)] (265.73(b)(1).	Y	
b.	Common name, EPA Hazardous Waste Identification Number and physical state (solid, liquid, gas) of the waste?	Y	
c.	The estimated (or actual) weight, volume or density of the waste material?	Y	
d.	A description of the method(s) used to treat, store or dispose of the waste using the EPA handling codes listed in Table 2 of OAC 3745? (Part 265, Appendix I, Table 2)	Y	
e.	The present physical location of each hazardous waste within the facility?	Y	
f.	Records of incidents which require implementation of the Contingency Plan?	Y	
g.	FOR DISPOSAL FACILITIES, the location and quantity of each hazardous waste recorded on a map of the facility and cross-references to any pertinent manifest document numbers? [3745-65-73(B)(2)] (265.73(b)(2))	NA	
h.	Records of any waste analyses and trial tests required to be performed?	Y	
i.	Records of the inspections required under 3745-65-15 (265.15) (General Inspection Requirements)?		
j.	Records of any monitoring, testing, or analytical data required under other Subparts as referenced by 3745-65-73(B)(6);(265.73(b)(6))?	Y	

	Y/N/NA	REMARK #
k. Records of closure cost estimates and post-closure (DISPOSAL ONLY) cost estimates required under OAC 3745-66 (Part 265 Subpart G)?	Y	
Has the o/o submitted an annual (bienniel) Treatment-Storage-Disposal Operating Report (by March 1) containing all of the operating information required under 3745-65-75 (265.75)?	Y	
NOTE: THE FOLLOWING REQUIREMENTS ARE APPLICABLE ONLY TO OFF-SITE TSDS.		
Are manifests received by the facility signed and dated? Is one copy given to the transporter, one copy sent to the generator within 30 days and one copy kept for at least 3 years? [3745-65-71(A)] (265.71)	NA	
a. If shipping papers are used in lieu of manifests (bulk shipments, etc.), are the same requirements met [3745-65-71(B)] (265.71(b))?		
b. Are any significant discrepancies in the manifest, as defined in 3745-65-72(A) (265.72(a)) noted in writing on the manifest document.		
Have any manifest discrepancies been reconciled within 15 days as required by 3745-65-72(B) (265.72(b)) or has the o/o submitted the required information to the Director/Regional Administrator?		
If the facility has accepted any unmanifested hazardous wastes from off-site sources for treatment, storage, or disposal, has an unmanifested waste report containing all the information required by 3745-65-76(A) (265.76) been submitted to the Director/Regional Administrator within 15 days?	Y	

OAC 3745-66 CLOSURE AND POST-CLOSURE (40 CFR PART 265. SUBPART G)

		Y/N/NA	REMARK #
1.	Is a written closure plan on file at the facility which contains the following elements: [3745-66-12] (265.112)?	Y	
	a. A description of how each hazardous waste management unit will be closed in accordance with 265.111.	Y	
	b. A description of how final closure will meet the requirements of 3745-66-11 (265.111).	Y	
	c. An estimate of the maximum amount of hazardous waste ever in inventory.	Y	
	d. A description of steps taken to remove or decontaminate facility equipment containment systems, structures, soils, and all hazardous waste residues.	Y	
	e. The year closure is expected to begin and a schedule for the various phases of closure.	Y	
	f. A description of other activities necessary to ensure closure with the performance standards including ground water monitoring, leachate collection, and run-off control.	NA	
2.	Has the closure plan (and post-closure plan, if applicable) been amended 60 days prior to any changes in facility design, processes, or closure dates or 60 days after an unexpected event occurs which affects the closure plan? [3745-66-12(C)] (265.112(C))	NA	
3.	Has the closure plan (and post-closure plan, if applicable) for surface impoundment, waste pile, land treatment or landfill units been submitted to the Director/Regional Administrator 180 days prior to beginning the closure process? [3745-66-12(D)] (265.112(d))	NA	
4.	Has the closure plan (and post-closure plan, if applicable) for tank, containers storage or incinerator units been submitted to the Director/Regional Administrator 45 days prior to beginning the closure process? [3745-66-12(D)] (265.112(d))	NA	

	Y/N/NA	REMARK #
Within 90 days of receipt of the final volume of waste or Director's plan approval, if that is later, was all hazardous waste treated, removed, or disposed in accordance with the approved plan? [3745-66-13(A)] (265.113(a))	NA	
. Was closure completed in accordance with the approved plan within 180 days after receipt of final volume of waste or approval of the plan, if that is later? [3745-66-13(B)] (265.113(b))	NA	
. Did the owner/operator submit to the Director/Regional Administrator, within sixty (60) days after completion of closure, certification by both the owner/operator and an independent registered professional engineer that the facility has been closed in accordance with the approved closure plan? [3745-66-15] (265.115)	NA	
. Did the owner/operator submit to the local zoning authority and the Director/Regional Administrator a survey plant in accordance with OAC 3745-66-16?	NA	
. What permitted units at the facility have been closed in accordance with an approved Closure Plan?	NA	
0. If closure was partial, list the regulated units which remain in use at the faciilty: TANKS #1 & #4 CONTAINERS		
1. If required, has the facility prepared a written post-closure plan? [3745-66-18] (265.118)	NA	
12. Does the post-closure plan include:		
a. A description of proposed ground water monitoring?		
b. A description of planned maintenance activities?		
c. The name, address and phone number of person/office to contact during the post-closure period?	Y	

	Y/N/NA	REMARK #
For disposal facilities, has the owner/operator submitted to local land authorities and the Director a survey plat within 60 days after certification of closure? [3745-66-19] (265.119)	NA	
14. Has the owner of the property on which a disposal unit is located recorded on the deed that:		
a. The land has been used to manage hazardous waste and the type, quantity and location of waste?		
b. Land use is restricted pursuant to 3745-66-17? [3745-66-19] (265.119)	↓	

C 3745-66 USE AND MANAGEMENT OF CONTAINERS (40 CFR PART 265, SUBPART I)

	Y/N/NA	REMARK #
Are hazardous wastes stored in containers which are:		
a. Closed [3745-66-73(A)] (265.173)?	Y	
b. In good condition [3745-66-71] (265.171)?	Y	
c. Compatible with the wastes stored in them [3745-66-72] (265.172)?	Y	
Are containers stored closed except when it is necessary to add or remove wastes? [3745-66-73(A)] (265.173(a))	Y	
Are hazardous waste containers stored, handled and opened in a manner which prevents container rupture or leakage? [3745-66-73(B)] (265.173(b))	Y	
Is the area where containers stored inspected for evidence of leaks or corrosion at least weekly? [3745-66-74] (265.174) [documentation of inspections required under 3745-65-15 for TSDs]	Y	
Are containers holding ignitable or reactive waste located at least 50 feet (15 meters) from the facility's property line? [3745-66-76] (265.176)	Y	
Are containers holding hazardous wastes stored separately from other materials which may interact with the waste in a hazardous manner? [3745-66-77(C)] (265.177(c))	Y	

AC 3745-66 STORAGE AND TREATMENT IN TANKS (40 CFR PART 265, SUBPART J)

Applicability: This checklist applies to owners or operators of facilities that use tank systems for storing or treating hazardous waste.

Note: Tanks used to store or treat wastes containing no free liquids (confirmed by the paint filter liquid test) that are located inside a building with an impermeable floor are exempt from secondary containment requirements 3745-66-93 (265.193).

For generators who store wastes in tanks for less than 90 days use all items except 24. Compliance with 3745-66-97(C) and OAC 3745-66-991 (265.191) (265.197) is not required.

		Y/N/NA	REMARK #
1.	Has the o/o obtained a variance from the secondary containment requirements of 3745-66-93 (265.193) from the (Regional Administrator/Director. If yes, skip items 2 through 6.	N	
2.	Has the o/o installed secondary containment which meets the requirements of 3745-66-93 (265.193) for each of the following classes of tank systems by the date specified. [3745-66-93(A)] (265.193)		
	a. For all new tank systems prior to being put into service.	NA	
	b. For all existing tanks used to handle waste No.'s F020, F021, F022, F023, F026, F027, before January 12, 1989.	NA	
	c. For existing tank system of known and documentable age, the latter of January 12, 1989, or when the tank reaches 15 years of age. Tanks 1, 2, 14, and 20 were installed in 1965.	N	#1 & #2
	d. For existing tank systems of undocumentable age, by January 12, 1995 or, if the facility was built prior to January 12, 1980, the latter of (1) when facility reaches 15 years of age or (2) January 12, 1989.	NA	
	e. For tank systems used to handle materials that became hazardous wastes after January 12, 1987, within the time frames required in (a) and (b) above, except that the date the material becomes a hazardous waste plus two years must be usbstituted for January 12, 1989.	NA	

#1. Adequate secondary containment has not been installed for tanks #1 and #14. GMC has proposed the installation of a vault-type secondary containment system for tank 14 and for tanks 1, 2, and 20 in March 1990. Adequate secondary containment was required to be in place by January 12, 1989.

#2. Adequate secondary containment has not been installed for the tote tanks in the passenger plant from which waste paints and solvents are pumped through piping to the interim status tank. GMC

(cont'd next page.)

		Y/N/NA	REMARK #
2.	If the tank system has no secondary containment, skip to #7.		
3.	Was the secondary containment system(s) at the facility designed, installed and operated to prevent any migration of wastes or liquid to the soil, ground water, or surface water and is it capable of detecting and collecting releases and accumulated liquids . [3745-66-93(B)] (265.193(b))	____	____
4.	At a minimum is the secondary containment system: [3745-66-93(C)] (265.193(c))		
	a. Constructed or lined with compatible materials with sufficient strength to prevent failure.	____	____
	b. Placed on a foundation or base capable of providing support.	____	____
	c. Provided with a leak detection system that is designed/operated to detect failure of primary or secondary containment or any release of hazardous waste in the secondary containment system within 24 hours of at earliest practicable time is provided.	____	____
	d. Sloped or designed to drain and remove liquid resulting from leaks, spills or precipitation and is liquid removed within 24 hours or in a timely manner.		
5.	Is the secondary containment system for tanks a liner (external to the tank), vault, double-walled tank or an equivalent device approved by the Director/Regional Administrator? [3745-66-93(D)(E)] (265.193(d)(e))	____	____
	a. External Liner		
	1. Is the external liner designed and operated to contain 100% of the capacity of the largest tank?	____	____
	2. Is the external liner designed and operated to prevent run-on and infiltration into the liner; or the collection system has excess capacity to contain run-on and infiltration from a 25-year, 24-hour storm?	____	____

considers the tote tanks to be ancillary equipment to tank #1. While the tote tanks are connected to the piping to the interim status hazardous waste tank they could be considered ancillary equipment, however such ancillary equipment is required by 40CFR265.193(f) to have full secondary containment that meets 265.193(b) and (c).

	Y/N/NA	REMARK #
3. Is the exterian liner free of cracks and gaps?	_____	_____
4. Does the external liner completely surround the tank and cover all earth likely to be contacted by waste during release?	_____	_____
b. Vault System		
1. Is the valut system designed and operated to contain 100% of the capacity of the largest tank?	_____	_____
2. Is the vault system designed and operated to prevent run-off and infiltration into the vault system, or the collection system has excess capacity to contain run-on and infiltration from a 25-year, 24-hour storm?	_____	_____
3. Are chemically resistant water stops in place at all joints?	_____	_____
4. Is there a compatible interior coating or lining to prevent migration of waste into the concrete?	_____	_____
5. If ignitable or reactive waste is being managed, is the vault system provided with a means to prevent formation or ignition of vapors?	_____	_____
6. Is the vault system provided with an exterior moisture barrier?	_____	_____
c. Doubled-Walled Tank		
1. Is the doubled-walled tank designed as an integral structure so any release from the inner tank is contained?	_____	_____
2. If metal, are the primary tank interior and outer shell exterior surfaces protected from corrosion?	_____	_____
3. Is the double-walled tank provided with a continuous leak detection system able to detect a release within 24 hours or at the earliest practicable time?	_____	_____

	Y/N/NA	REMARK #
Is ancillary equipment including above ground piping, welded flanges and joints, sealless pumps and valves, provided with secondary containment (e.g., double-walled piping, jacketing, trench)?		
a. If no, is ancillary equipment inspected daily for leaks? [3745-66-93(F)] (265.193(f))		
For existing tank system, without secondary containment that meets 3745-66-93 (265.193) standards, does the o/o have a written assessment certified by an independent P.E. that includes all of the following: [3745-66-91(A)(B)] (265.191(a)(b))	N	#1
a. Design standards?	U	
b. The characteristics of hazardous waste(s) that have been or will be handled?	U	
c. Corrosion protection measures?	U	
d. The age of the tank system has been estimated or documented?	U	
e. A leak test for non-enterable underground tanks?	NA	
f. A leak test or an internal inspection by qualified P.E. for other than non-enterable underground tanks? OTHER INTEGRITY EXAMINATION	U	
Have the tests specified in 7f and ~~7g~~ been conducted annually until secondary containment is provided [3745-66-93(I)(4)] (265.193(4)):	N	
For tank systems found to be leaking or unfit for use as a result of the above tests or inspections, has the o/o complied with 3745-66-96 (265.196)? If no, this is a violation of [3745-66-93(I)(4) (265193(i)(4))	NA	
0. For tanks without secondary containment used to store or treat wastes which become hazardous wastes after July 14, 1986, has the o/o done the assessment within 12 months after the date the waste became a hazardous waste? [3745-66-91(C)] (265.191(c))	NA	

#1. The assessment completed in December 1989 and given to me at the inspection indicates you plan to store F003 and F005 wastes #1, 2 and 4 and plan to use tank #20 as an overflow or overfill prevention control for tanks 1 and 2. Before tank 2 can be legally used for hazardous waste storage, a permit change request must be submitted and approved.

The integrity assessment was required by January 12, 1988 by the federal regulations and by January 7, 1989 under the state regulations. Leak tests and certified assessments must be conducted annually until adequate secondary containment is provided. Records of these must be maintained on file at the facility.

Ancillary equipment, such as the tote tanks, needs to be

(contid on next page)

	Y/N/NA	REMARK #
For all tanks found to be leaking or unfit for use as a result of the assessment the o/o has complied with 3745-66-96 265.196 (see #18) [3745-66-91(D)] (265.191(d) and [3745-66-93(I)] (265.193(i)(4))	NA	
12. For new tank systems, (constructed began after July 14, 1986) has the o/o obtained a written assessment certified by an independent qualified P.E. that includes all of the following: [3745-66-92(A)] (265.192(a))		
a. Design standards	NA	
b. The characteristics of hazardous waste to be stored or treated		
c. Corrosion protection for tank systems in contact with soil or water		
d. Protection from vehicular traffic for undergroun tanks		
e. Adequacy of tank foundation, proper anchoring and effects of frost heave		
13. Does the o/o have on file at the facility, written statements by those persons who supervised installation or certified design of the new tank system, that the tank system was properly installed, designed and that required repairs were performed [3745-66-92(G)] (265.192(g)). Does the statement address all of the following:		
a. Inspection for damage and/or inadequate construction and installation and a statement that deficienices were corrected before the tank system was covered or put into use. [3745-66-92(B)] (265.192(b))	NA	
b. Proper backfilling; [3745-66-92(C)] (265.192(c))		
c. Tightness test, if the tank was found not to be tight proper repairs were made; [3745-66-92(D)] (265.192(d))		
d. Proper support and protection of ancillary equipment; [3745-66-92(E)] (265.192(e))		
e. Supervision of the installation of field fabricated corrosion protection. [3745-66-92(F)] (265.192(f))		

considered and discussed in the integrity assessment including design and construction standards and the documented age of that equipment.

	Y/N/NA	REMARK #

Has the o/o of a tank system with a variance from secondary containment at which a release of hazardous waste has occurred from the tank but has not migrated beyond the zone of engineering control complied with 3745-66-96(A)(B)(C)(E)(F) and 265.196 (a)(b)(c)(e) and (f) and decontaminated or removed contamined soil. If soil cannot be removed, has the tank been closed [3745-66-93(G)(3)] (265.193(g)(3)) — NA

.5. Has the o/o of a tank system with a variance from secondary containment at which a release of hazardous waste has occurred from the tank and has migrated from the zone of engineering control complied with 3745-66-96(A)(B)(C) and (D) (265.196 (265.193(g)(4)(i) and (ii)? See #18 — NA

.6. Does the o/o follow the general operating requirements below: [3745-66-94] (265.194)

a. Hazardous waste or treatment reagents are not placed in the tank or secondary containment if they can cause the system to leak, rupture, corrode, or otherwise fail.	Y	
b. The o/o uses appropriate controls to prevent spills or overflows from the system (e.g., check valves, high level alarms)	N	#1, #3
c. The o/o has complied with 3745-66-96 (265.196) when a leak or spill has occurred. (See page 40)	N	#2

17. Has the o/o documented the inspections required in 3745-66-95 (265.195), in the operating record of the facility, including the following: (IF PRESENT)

a. ~~Spill~~ OVERFILL control equipment (daily). system	N	#3
b. Above ground portion of the tank (daily).	N	#6
c. Data from monitoring and leak detection equipment (daily).	N	#4
d. Construction materials and the immediate area surrounding the tank to detect signs of erosion or signs of releases of hazardous waste (daily). (including secondary containment system)	N	#5

#1 Liquid levels in tanks 1, 2, 14, 20 are controlled by observation and manual operation. Spillage was observed by tank #14.

#2. A written report on the spill of hazardous waste from tank #14 was not submitted within 30 days to the Director and Regional Administrator.

#3. Liquid levels in tanks are controlled manually. There is no overfill control equipment.

#4. Tanks don't have monitoring and leak detection equipment.

#5. Secondary containment for tanks #1 and #14 is not documented as inspected daily.

	Y/N/NA	REMARK #
e. The cathodic protection system to confirm its proper operation within six months of its initial installation and annually thereafter.	NA	
f. All sources of impressed current at least bi-monthly.	NA	

8. Has the o/o of a tank system or secondary containment system from which there has been a leak or spill or which is unfit for use removed the tank from service and satisfied the following requirements. 3745-66-96 (265.196)

a. Immediately ceased flow into tank or tank system or sec. containment system and investigated cause of release	NA	
b. For release from tank system, removed waste to prevent further release within 24 hours of detection or earliest practicable time.	NA	
c. For releases to a secondary containment system removed all released material within 24 hours or as timely as possible to prevent harm to human health and the environment.	NA	
d. Immediately conducted a visual inspection of the release and prevent further migration and removed and disposed of any visible contamination of soil or surface water.	Y	
e. Reported any release to the environment to the Director (Regional Administrator) within 24 hour unless it is less than 1 lb. and was cleaned up immediately.	N	#7
f. Submitted a report wihtin 30 days of the release to Director (Regional Administrator).	N	#8

9. If a release has occured from the tank system have the following requirements been satisfied: 3745-66-96(E)(1) (265.196(e)(1))

a. The cause of the release was a spill which did not damage the tank system and the o/o returned the system to service.	Y	
b. The cause of the release was a leak from the primary tank and the system was repaired and returned to service.	NA	

#6 (from previous page)
Ancillary pipes and equipment for tanks #1 and #14 are not documented as inspected daily.

#7. The Regional Administrator and Director were not notified within 24 hours of spill from tank #14.

#8. A written report on this spill was not submitted within 30 days to the Director & Regional Administrator.

	Y/N/NA	REMARK #
c. If the source of the release was a leak from a component without secondary containment the component was provided with secondary containment or visually inspected above ground.	Y	
d. If a through e have not been satisfied, has the tank been closed in accordance with OAC 3745-66-97?	NA	
e. The o/o has obtained certification from an independent P.E. if the repairs were major (i.e., installation of liner, repair of ruptured primary or secondary containment vessel).	NA	
20. If the requirements if #17 have not been met, has the o/o completed closure of the tank system in accordance with 3745-66-97 (265.197)?	NA	
21. For tanks used to treat or store ignitable or reactive wastes, has the o/o complied with one of the following: [3745-66-98(A)] (265.198(a))		
a. The waste is treated immediately after placement in the tank so that the resultant mixture is no longer ignitable or reactive and the o/o complied with 3745-65-17(B) (265.17(b)); or	N	
b. The waste is stored or treated to protect it from materials or conditions which may cause ignition or reaction; or	Y	
c. The tank is used solely for emergencies.	NA	
22. If ignitable or reactive waste is stored or treated, are protective distances maintained between waste management area and any public streets, alleys or adjoining property lines as required by the NFPA flammable or combustible code (1977 or 1981): [3745-66-98(B)] (265.198(b))	Y	

	Y/N/NA	REMARK
13. Has the o/o placed incompatible wastes or materials into the same tank system or into a tank system that has not been decontaminated and which previously held an incompatible waste or material [3745-66-99] (265.199)?	N	
a. If so, have the requirements of 3745-65-17(B) (265.17(b)) been met?	NA	
14. In addition to conducting the waste analysis required by 3745-65-13 (165.13) when the tank system is used to store or treat a waste which is substantially different or uses a substantially different process than previously used, has the o/o done one of the following: [3745-66-991] (265.200)		
a. Conducted waste analysis and trial treatment storage tests.	NA	
b. Obtained written documentation on similar waste under similar operating conditions.	NA	

OAC 3745-67 SURFACE IMPOUNDMENTS (40 CFR PART 265 SUBPART K)

		Y/N/NA	REMARK #
1.	Is at least 2 feet (60 cm) of freeboard maintained in the surface impoundment, or has written certification that the impoundment is of adequate design been prepared? [3745-67-22] (265.222)	NA	
2.	Are earthen structural containment systems equipped with protective cover such as grass, shale or rock to minimize erosion from wind and water. [3745-67-23] (265.223)		
3.	Is the level of freeboard in the surface impoundment inspected at least once each operating day, the structural containment system is inspected at least once per week and all such inspections are documented. [3745-67-26] (265.226)		
4.	Whenever a surface impoundment is used to treat or store wastes substantially different from previous wastes or when substantially different treatment processes are used in the surface impoundment, has the facility insured the safety of such changes by: [3745-67-25] (265.225)		
	a. Waste analyses and trial treatment or		
	b. Written documented information on similar treatment of similar waste under similar conditions?		
5.	With the exception of emergency situations, whenver ignitable or reactive wastes are placed in a surface impoundment has the facility insured the safety of the operation by complying with the following: [3745-67-29 and 3745-65-17] (265.229 and 265.17(b))		
	a. The waste is immediately treated after placement in the the surface impoundment so that it is no longer hazardous?		
	b. The waste is managed to protect from ignition?		
	c. A certification from a qualified chemist or engineer is maintained at the facility stating that the design/operation of the unit will prevent ignition or reaction?		

	Y/N/NA	REMARK #
. Incompatible materials are not placed in the same surface impoundment unless it is done in compliance with the safety requirements of 3745-65-17 (165.17(b)? [3745-67-30] (265.230)	_____	_____
. At closure, were all standing liquids, waste residues, liners, and contaminated soil removed from the unit? [3745-67-28](265.228)	_____	_____
. Has the owner/operator retrofitted the surface impoundment or ceased receipt of hazardous waste by November 8, 1988? If no, did USEPA grant an exemption prior to that date?	_____	_____

OTE: IF THE OPERATOR ELECTS NOT TO EXEMPT THE SURFACE IMPOUNDMENT FROM FURTHER REGULATION Y REMOVING ALL WASTE MATERIALS, THE SURFACE IMPOUNDMENT IS SUBJECT TO THE POST-CLOSURE CARE ND GROUND WATER MONITORING REQUIREMENTS SPECIFIED IN 3745-68-10 AND 3745-67-28(C).

OAC 3745-67 TREATMENT OR STORAGE IN WASTE PILES (40 CFR Part 265 SUBPART L)

		Y/N/NA	REMARK #
1.	Waste materials which are subject to dispersal by wind have been adequately protected against such dispersal? [3745-67-51] (265.251)	NA	
2.	If leachate or run-off from a Waste Pile is a hazardous waste, then following steps have been taken to prevent or properly manage the situation: [3745-67-53] (265.253)		
a. (1)	The pile has been placed on an impermeable base that is compatible with the waste under conditions of treatment or storage; and		
(2)	A run-on control system capable of handling a 24 hr, 25-yr storm has been implemented; and		
(3)	A run-off management system capable of controlling a 24 hr, 25-yr storm has been implemented; and		
(4)	Facilities associated with run-on and run-off control systems are managed to maintain design capacity after a rain event; or		
b. (1)	The pile has been protected from precipitation and run-on in a manner which prevents the generation of leachate and runoff; and		
(2)	No liquids or wastes containing free liquids are placed in the pile.		
3.	No new waste materials are added to an existing Waste Pile without first ascertaining that the material is compatible with the existing waste by conducting appropriate laboratory tests, which are documented in the facility operating record. [3745-67-52] (265.252)		

	Y/N/NA	REMARK #

Are ignitable or reactive wastes not placed in waste piles unless one or both of the following conditions is met: [3745-67-56] (265.256)

a. The addition to the pile results in a mixture which no longer meets the definition of Ignitable or Reactive under rules 3745-51-21 or 3745-51-23 and was done in compliance with the safety requirements of 3745-65-17. (265.17(b)) _____ _____

b. The Ignitable or Reactive material is physically or otherwise protected from conditions which may cause ignition or reaction. _____ _____

5. Are incompatible wastes, ignitable and reactive wastes placed in the waste pile only in accordance with the safety requirements of 3745-65-17? [3745-67-56 and 3745-67-57(A)] (265.256 and 265.257(a)) _____ _____

6. Is a waste stored in a pile which is incompatible with materials stored nearby, separated or protected from them? [3745-67-57(B)] (265.257(b)) _____ _____

7. At closure, have all waste residues and contaminated soils and structures been managed as hazardous waste? (Note: if all contaminated soils, structures, etc., cannot be removed, post-closure care as a landfill must be conducted) [3745-67-58] (265.258) _____ _____

AC 3745-67 LAND TREATMENT (40 CFR PART 265, SUBPART M)

	Y/N/NA	REMARK #
1. Is the hazardous waste which is being managed by land treatment, made less hazardous or nonhazardous by degradation, transformation or immobilization occurring in the soil? [3745-67-72(A)] (265.272(a))	NA	
2. Are run-off and run-on management systems capable of controlling a 24 hr, 25-yr rain event? [3745-67-72(B)(C)] (265.272(b)(c))		
a. If run-off is hazardous waste, is it managed in accordance with applicable rules? [3745-67-72(B)] (265.272)		
b. Are the facilities associated with run-on and run-off systems managed to maintain design capacity after rain events? [3745-67-72(D)] (265.272(d))		
c. If the unit is subject to wind dispersal, is it managed to control the dispersal? [3745-67-72(E)] (265.272(e))		
3. Has the owner/operator determined the following information about the waste being land treated: [3745-67-73(A)(B)(C)] (265.273(a)(b)(c)		
a. Levels of EP toxic contaminants exceeding the maximum concentrations in Table I of 3745-51-24?		
b. For wastes listed in 3745-51, the concentrations of constituents causing the waste to be listed?		
c. If food chain crops are grown, the concentrations of arsenic, cadmium, lead and mercury in the waste?		
4. If food chain crops are grown at the facility, has the owner or operator addressed the requirements of 3745-67-76? (265.276)		

		Y/N/NA	REMARK #
5.	Has an unsaturated zone monitoring plan been written, designed and implemented to detect the vertical migration of hazardous waste and provide information on the background concentrations of the hazardous waste? [3745-67-78] (265.278)		
	a. Is the plan kept at the facility along with the rationale used to develop it? [3745-67-78(D)] (265.278(d))		
6.	Does the unsaturated zone monitoring plan specify the following minimum information: [3745-67-78] (265.278)		
	a. Soil monitoring with soil cores?		
	b. Soil pore monitoring?		
	c. The depth of sampling relative to depth of waste incorporation. (Sampling is below depth of waste)?		
	d. Number of soil and soil-pore water samples to be taken?		
	e. Are soil and soil pore water samples analyzed for the hazardous waste constituents that were found in the waste?		
7.	Are records kept regarding application dates and rates, quantities, and locations, of all hazardous waste placed in the facility? [3745-67-79] (265.279)		
8.	Are ignitable or reactive wastes immediately incorporated into the soil so that they are rendered non-hazardous? [3745-67-81] (265.281)		
9.	Are incompatible wastes land treated? (If yes, 3745-65-17/ 265.17(b) applies)		
10.	A written closure and post-closure plan is on file at the facility which describes all activities and addresses all of the plan elements required by 3745-66-12, 3745-66-18, and 3745-67-80. (265.118, 265.112, and 265.280).		

	Y/N/NA	REMARK #
1. Has the closure/post-closure plan been amended 60 days prior to any changes in facility design, or operation, no later than 60 days after an expected event has occurred which has effected the closure plan? [3745-66-12(C), and 3745-66-18(D)] (265.118(d)), and (265.112(c)).	_____	_____
2. Has the closure/post-closure plan been submitted to the Director/ Regional Administrator 180 days prior to beginning closure? [3745-66-12(D), and 3745-66-18(E) (265.118(e), and 265.112(d).	_____	_____
3. Has the property owner attached a notation to the property deed or other instrument which will notify any potential purchaser that the property has been used to manage hazardous waste and future use of the property is restricted under 3745-66-17(C)(265.117(c)) as required in 3745-66-20 (265.119(b)).	_____	_____

AC 3745-68 LANDFILLS (40 CFR PART 265, SUBPART N)

	Y/N/NA	REMARK #
. General Operating Requirements. Does the facility provide the following:		
a. Run-on control capable of handling a 24-hr, 25-yr storm? [3745-68-02(A)] (265.302(a))	NA	
b. Run-off control capable of handling a 24-hr, 25-yr storm? [3745-68-02(B) (265.302(b))		
c. If run-off is hazardous waste, is it managed in accordance with applicable rules? [3745-68-02(B)]		
d. Are facilities associated with run-on and run-off control systems managed to maintain design capacity after rain events? [3745-68-02(C)] (265.302(c))		
e. Control of wind dispersal of hazardous waste? [3745-68-02(D)] (265.302(d))		
2. Surveying and Recordkeeping. Does the operating record include: [3745-68-09] (265.309)		
a. A map showing the exact location and dimensions of each cell? [3745-68-09(A)] (265.309(a))		
b. The contents of each cell and the location of each hazardous waste type within each cell? [3745-68-09(B)] (265.309(b))		
3. Are ignitable or reactive wastes treated so the resulting mixture is no longer ignitable or reactive? [3745-68-12] (265.312(a)(b))		

NOTE: IF WASTE IS RENDERED NON-REACTIVE OR NON-IGNITABLE, SEE TREATMENT REQUIREMENTS. IF NOT, THE PROVISIONS OF 3745-65-17 AND 3745-68-12(B) APPLY. (40 CFR 265.17(b))

		Y/N/NA	REMARK #
4.	Does the owner/operator dispose of incompatible wastes in separate cells? [3745-68-13] (265.313) If not, the provisions of 3745-68-15 apply. (265.17(b)	_____	_____
5.	Are empty containers crushed flat, shredded, or similarly reduced in volume before being buried beneath the surface of the landfill? [3745-68-15] (265.315)	_____	_____
6.	Are containers at least 90% full prior to placement in the landfill?	_____	_____
7.	Is bulk or non-containerized liquid waste or waste containing free liquids treated so that free liquids are not longer present. [3745-68-14(A)] (265.314(a))	_____	_____
8.	Are containers other than lab packs, ampules, batteries or capacitors holding free liquids placed in the landfill? [3745-68-14(B)] (265.314(b)) If yes, has all free liquid been removed, absorbed or otherwise eliminated?	_____ _____	_____ _____
9.	Has the owner/operator employed Method 9095 (Paint Filter Liquids Test) to demonstrate the absence of free liquids in containerized or bulk waste? [3745-68-14(D)] (265.314(d))	_____	_____
10.	Are the special requirements for lab pack waste met? [3745-68-16] (265.316)	_____	_____
11.	Is a written closure/post-closure plan available for inspection at the facility? [3745-66-12] (265.112)	_____	_____
12.	Has the closure/post-closure plan been amended 60 days prior to any changes in facility design, or operation, or no later than 60 days after an unexpected event has occurred which has effected the closure plan? [3745-66-18(D)](265.118(d))	_____	_____

		Y/N/NA	REMARK #
.	Does the owner/operator dispose of incompatible wastes in separate cells? [3745-68-13] (265.313) If not, the provisions of 3745-68-15 apply. (265.17(b)	_____	_____
5.	Are empty containers crushed flat, shredded, or similarly reduced in volume before being buried beneath the surface of the landfill? [3745-68-15] (265.315)	_____	_____
6.	Are containers at least 90% full prior to placement in the landfill?	_____	_____
7.	Is bulk or non-containerized liquid waste or waste containing free liquids treated so that free liquids are not longer present. [3745-68-14(A)] (265.314(a))	_____	_____
8.	Are containers other than lab packs, ampules, batteries or capacitors holding free liquids placed in the landfill? [3745-68-14(B)] (265.314(b)) If yes, has all free liquid been removed, absorbed or otherwise eliminated?	_____	_____
		_____	_____
9.	Has the owner/operator employed Method 9095 (Paint Filter Liquids Test) to demonstrate the absence of free liquids in containerized or bulk waste? [3745-68-14(D)] (265.314(d))	_____	_____
10.	Are the special requirements for lab pack waste met? [3745-68-16] (265.316)	_____	_____
11.	Is a written closure/post-closure plan available for inspection at the facility? [3745-66-12] (265.112)	_____	_____
12.	Has the closure/post-closure plan been amended 60 days prior to any changes in facility design, or operation, or no later than 60 days after an unexpected event has occurred which has effected the closure plan? [3745-66-18(D)](265.118(d))	_____	_____

		Y/N/NA	REMARK #
13.	Has the closure/post-closure plan been submitted to the Director/ Regional Administrator 180 days prior to beginning closure? [3745-66-18(E)] (265.118(e))	_____	_____
14.	Does the plan contain information required in 3745-68-10? (265.310)	_____	_____
15.	Is a closure cost estimate available?	_____	_____
16.	Has closure begun?	_____	_____
17.	Has the property owner attached a notation to the property deed or other instrument which will notify any potential purchaser that the property has been used to manage hazardous waste and future use of the property is restricted under 3745-66-17(C) (265.117(c)) as required in 3745-66-19 (265.119(b))?	_____	_____

AC 3745-68 INCINERATION AND THERMAL TREATMENT (40 CFR PART 265, SUBPARTS O AND P)

	Y/N/NA	REMARK #
1. Before adding hazardous waste, is the unit brought to steady state utilizing an auxiliary fuel? [3745-68-73 or 3745-68-45] (265.373 or 265.345)	NA	
a. List type of fuel used_____		
b. Is the process a batch thermal treatment process?		
c. Is the unit a boiler, industrial furnace, thermal treatment unit, or incinerator?		
d. Does the unit burn waste which is hazardous solely due to ignitability, reactivity, or combustibility?		
2. Waste Analysis. IN ADDITION TO ANALYSES REQUIRED UNDER 3745-65-13, THE FOLLOWING ARE MINIMUM REQUIREMENTS FOR WASTES NOT PREVIOUSLY BURNED/TREATED: [3745-68-41 and 3745-68-75] (265.341 and 265.375)		
a. Heating value.		
b. Halogen content.		
c. Sulfur content.		
d. Has documented or written data been substituted for analysis of either:		
1. Lead?		
2. Mercury?		
e. List other parameters for which the waste is tested to enable the owner/operator to establish steady state or determine the types of pollutants which may be emitted. (Note in remarks any which you feel should be tested)		

RCRA LAND DISPOSAL RESTRICTION INSPECTION

Hard Copy

Facility: GMC - ROC - LORDSTOWN

U.S. EPA I.D. No.: OHD 020 632 008

Street: 2300 HALLOCK YOUNG RD., P.O. BOX 1406

City: WARREN State: OHIO Zip: 44482

Telephone: 216 · 824 · 5705

Owner/Operator:

Street: JOHN DOHERTY, AREA MGR.

City: (SAME) State: _____ Zip: _____

Telephone: _____

Inspection Date: ~~1/30/90~~ 2/2/90 Time: 9AM-3:45

Weather Conditions: RAINY, CLOUDY - 40°F

	Name	Agency/Title	Telephone
Inspectors:	SHERRY SLONE	OEPA/DISTRICT ENGR	216·425·9171
	GREG TAYLOR	OEPA/ENV. SCIENTIST	"
Facility Representative:	JULIE BLACKBURN.		216·824·5795
	BEN KRISTAN		"
	KAREN TRESSLER		"

	Generate	Transport	Treat	Store	Dispose
F-Solvent	✓			✓	
Dioxin					
California List	✓			✓	
First Third					
Second Third					

INSPECTION SUMMARY

Processes That Generate LDR Wastes

F002 - Body shop door line - smooth sealer with trichloroethan
CMB - parts cleaner - clean pump parts with methylene chlori
mixture
Spills

F003 - Paint shops, purge thinner - xylene
Paint spraying equipment cleaner - xylene
Spills

F005 - Paint line cleaner - toluene (small amount of xylene also)
Windshield Operation Line - fill lines with MEK while not used
Spills

~~LDR Waste Management~~

PCB - transformers and capacitors intact
- Spills

HOCs - Maintenance areas - parts cleaners - solvent blends from Safety Kleen

Cr - Van plant paint mixed with solvents

Pb - Van and passenger plant paint mixed with solvents (Safety Kleen)

LDR Waste Management

F003, F005 - bulk thinner tanks → tank truck → fuels program, material recovery (Chemical Waste Management, Solvent Resource Recovery/Michigan Disposal)

~~Summary~~

- bulk oil emulsion → tank truck → materials recovery (RTR)
- drums of sludge, clean ups, etc. → incinerator (Ross, CWM-Chicago)

F002 - drums → fuel blending or incineration (CWM, Resource Recovery-W. Carrollton, Ross)

PCB - incineration (CWM-Chicago, Enseco-Arkansas)

RCRA LAND DISPOSAL RESTRICTION INSPECTION

WASTE IDENTIFICATION

1. Does the facility handle the following wastes?

   a. F001 through F005 spent solvents

      Yes ✓ No ___ List* _____

   b. Dioxin-containing Wastes

      Yes ___ No ✓ List* _____

   c. California List Wastes

      Yes ✓ No ___ List* _____

   d. First and Second Third Wastes

      Yes ___ No ✓ List* _____

   * List wastes if room allows or attach Appendix A.

   Note: Please be aware of potential misclassification of wastes (i.e., California list/"soft hammer"/characteristic waste applicabilities).

2. Does the facility handle the following wastes (national capacity variances)?

   a. F001 - F005 contaminated soil or debris resulting from a CERCLA response action or RCRA corrective action (effective date — 11/08/90).

      Yes ___ No ✓ Comments _____

   b. Dioxin contaminated soil and debris resulting from a CERCLA response action or a RCRA corrective action (effective date — 11/08/90).

      Yes ___ No ✓ Comments _____

   c. California list contaminated soil or debris resulting from a CERCLA response action or a RCRA corrective action (effective date — 11/08/90).

      Yes ___ No ✓ Comments _____

d. First Third wastes with the following waste codes: K048, K049, K050, K051, K052, or K071 (effective date - 08/08/90).

Yes ___ No ✓ Comments _____

e. First Third contaminated soil and debris which have a treatment standard based on incineration - K016, K018, K019, K020, K022, K024, K030, K037, K048-K052, K086, K087, K101, K102, K103, and K104 (effective date — 08/08/90).

Yes ___ No ✓ Comments _____

f. Second Third contaminated soil and debris which have a treatment standard based on incineration - F010, F024, K009, K010, K011, K013, K014, K023, K027, K028, K029, K038, K039, K040, K043, K093, K094, K095, K096, K113, K114, K115, K116, P039, P040, P041, P043, P044, P062, P071, P085, P089, P094, P097, P109, P111, U028, U058, U069, U087, U088, U102, U107, U109, U221, U223, U235 (effective date — 06/08/91).

Yes ___ No ✓ Comments _____

GEN

RCRA LAND DISPOSAL RESTRICTION INSPECTION

GENERATOR CHECKLIST

2B(1)
Ref. Fed. Reg Vol 55 No 10

GENERATOR REQUIREMENTS

A. Treatability Group - Treatment Standards Identification

1. F-Solvent Wastes: Does the generator correctly determine the appropriate treatability group of the waste?

Yes ✓ Sometimes No ✓ NA ___ Newer forms supplied by Chemical Waste Management don't have treatability group or treatment standards indicated. The form simply references the regulations. (See attachment A)

If yes, check the appropriate treatability group.

___ Wastewaters containing solvents (less than or equal to 1% total organic carbon (TOC) by weight)

✓ All other spent solvent wastes

2. First and Second Third Wastes: Does the generator correctly determine the appropriate treatability group of the waste?

Yes ___ No ___ NA ✓

If yes, list the waste code and check the correct treatability group.

Waste Code	Wastewater*	Non-wastewater
_____	_____	_____
_____	_____	_____
_____	_____	_____

* Less than 1% TOC by weight and less than 1% filterable solids.

3. California List Wastes: Has the generator correctly identified the required treatment technology [268.42]?

a. For liquid hazardous waste that contains PCBs at concentrations greater than or equal to 50 but less 500 ppm, is the treatment in accordance with existing TSCA thermal treatment regulations for burning in high efficiency boilers (40 CFR 761.60) or incineration (40 CFR 761.70)?

Yes ✓ No ___ NA ___

If yes, specify the method: incineration

b. For liquid hazardous waste that contains PCBs at concentrations greater than or equal to 500 ppm, is the waste incinerated [40 CFR 761.70] or disposed of by other approved alternate methods [40 CFR 761.60(e)]?

Yes ✓ No ___ NA ___

If an alternative method is used, specify the method and state whether the facility has received approval from the Regional Administrator or Director, Exposure Evaluation Division, for an exemption from the incineration requirement:

_____

_____

_____

c. For hazardous waste that contains halogenated organic compounds (HOCs) in total concentrations greater than or equal to 1,000 mg/L or 1,000 mg/Kg (except dilute HOC wastewater), is the waste incinerated in accordance with existing requirements of 40 CFR Part 264 Subpart O or 40 CFR Part 265 Subpart O? 5700 ppm HOCs – sent to Safety Kleen were its recycled and reused

Yes ___ No ___ NA ___

4. Does the generator mix restricted wastes with different treatment standards?

Yes ___ No ✓ Comments wastes are 'as is' coming out of process

If yes, did the generator select the most stringent treatment standards (268.41(b), 268.43(b))? NA

Yes ___ No ___ Comments _____

B. Waste Analysis

1. Does the generator determine whether the restricted waste exceeds treatment standards or prohibition levels at the point of generation by:

- Knowledge of waste Yes ✓ No ___

List the wastes for which "applied knowledge" was used and describe the basis of the applied knowledge determination.
PCB's & waste solvents – MSDS sheets

_____

Was all supporting data retained on-site, [268.7(a)(5)]?

Yes ✓ No ___ MSDS info is computerized

- TCLP Yes ___ No ___ NA ___

List the wastes for which TCLP was used and provide the date of last test, the frequency of testing, and note any problems. Attach test results.
TCLP was used 8-10-89 to analyze WWTP sludge, Passenger plant central sludge and van plant central sludge. (See Attachment B.)

- Total constituent analysis Yes ___ No ✓ NA ___

List the wastes for which total constituent analysis was used and provide the date of last test, the frequency of testing, and note any problems. Attach test results.

- pH ≤ 2 Yes ✓ No ___ NA ___

List the wastes for which pH testing was used.
caustic sludges, acid cleaners

- Paint Filter Liquid Test Yes ✓ No ___ NA ___

List the wastes for which PFLT was used.
paints, all liquid wastes, sludges

2. Does the facility dilute the restricted waste as a substitute for adequate treatment [268.3]?

Yes ___ No ✓ NA ___

C. Management

1. On-Site Management

Is restricted waste treated, stored for greater than 90 days, or disposed on-site?

Yes ✓ No ___ Comments _____

If yes, the TSD Checklist must be completed.

GEN

2. Off-Site Management

a. Does the generator ship any waste that exceeds the treatment standards to an off-site treatment or storage facility?

Yes ✓ No ___ (If no, go to b)

If yes, identify waste code and off-site treatment or storage facilities:

Waste Code	Facilities	Treat/Store
F002	Envirite, Resource Recovery	✓ ✓
	Chem WM	
F003	Ross	✓ ✓
F005	Michigan Disposal	✓ ✓

- Does the generator provide notification to the treatment or storage facility [268.7(a)(1)]?

Yes ✓ No ___

- Does notification contain the following?

EPA Hazardous waste number(s) Yes ✓ No ✓ (See comment to question #1 on page 5.)

Applicable treatment standards and prohibition levels Yes ✓ No ✓

Manifest number Yes ✓ No ___

Waste analysis data, if available Yes ✓ No ___

b. Does the facility ship any waste that meets the treatment standards to an off-site disposal facility?

Yes ___ No ✓ (If no, go to c)

If yes, identify waste code and off-site disposal facilities:

Waste Code	Facility

- Does the facility provide notification and certification to the disposal facility [268.7(a)(2)]?

  Yes ___ No ___

- Does notification contain the following?

EPA Hazardous waste number(s)	Yes ___	No ___
Applicable treatment standards and prohibition levels	Yes ___	No ___
Manifest number	Yes ___	No ___
Waste analysis data, if available	Yes ___	No ___
Certification that the waste meets treatment standards [wording in 268.7(a)(2)(ii)]	Yes ___	No ___

c. Is the waste subject to a nationwide variance, case-by-case extension (268.5), or no migration petition (268.6).

  Yes ___ No ✓ (If no, go to d)

- If yes, does the generator provide notification to the off-site receiving facility that the waste is not prohibited from land disposal [268.7(a)(3)]?

  Yes ___ No ___

- Does the notification contain the following information?

EPA hazardous waste number	Yes ___	No ___
The corresponding treatment standards and all applicable prohibitions	Yes ___	No ___
Manifest number	Yes ___	No ___
Waste analysis data, if available	Yes ___	No ___
Date the waste is subject to the prohibitions	Yes ___	No ___

d. Does the facility generate any First or Second Third "soft hammer" waste?

  Yes ___ No ✓ (If no, go to 4)

GEN

- Does the generator provide the following notification to the receiving facility with each shipment of waste [268.7(a)(4)]? NA

(i)	EPA hazardous waste number	Yes ___	No ___
(ii)	Applicable prohibition [268.33(f), 268.34(h)]	Yes ___	No ___
(iii)	Manifest number	Yes ___	No ___
(iv)	Waste analysis data, if available	Yes ___	No ___

3. "Soft Hammer" Demonstrations/Certifications NA

a. Are any "soft hammer" wastes or treatment residues destined for ultimate disposal in a landfill or surface impoundment?

Yes ___ No ___

b. Has the generator attempted to locate and contract with treatment and recovery facilities that provide treatment that yields the greatest environmental benefit [268.8(a)(1)]?

Yes ___ No ___

c. Has the generator submitted a demonstration and certification to the Regional Administrator to document its efforts to locate practically available treatment [268.8(a)(2)]?

Yes ___ No ___

- If yes, did the generator submit the documentation and certification prior to first shipment?

Yes ___ No ___

d. Does the demonstration contain the following information?

A list of facilities and facility officials contacted?	Yes ___	No ___
Addresses	Yes ___	No ___
Telephone numbers	Yes ___	No ___
Contact dates	Yes ___	No ___
Certification statement	Yes ___	No ___

Attach a copy of the demonstration and certification.

e. If there is no practically available treatment, has the generator included with the demonstration, a written discussion of why the generator was not able to obtain treatment or recovery for that waste [268.8(a)(2)(i)]?

Yes ___ No ___ NA ___

If yes, attach a copy of written discussion.

f. Does the generator ship its "soft hammer" waste off-site for treatment?

Yes ___ No ___

Describe the type of treatment and treatment facilities:

Waste Code	Type of Treatment	Treatment Facility

g. Did the generator send a copy of its demonstration and certification to the receiving facility with the first shipment of waste?

Yes ___ No ___

h. Does the generator provide certification with each subsequent shipment of wastes to receiving facilities?

Yes ___ No ___ NA ___

4. Records Retention

Does the facility retain on-site copies of all notifications, demonstrations, and certifications for a period of 5 years [268.7(a)(6)]?

Yes ✓ No ___ Comments - to date

GEN

D. RCRA Corrective Action and CERCLA Response Action Waste NA

1. Has the facility disposed of contaminated soil and debris from a RCRA corrective action or a CERCLA response action in a landfill or surface impoundment?

   Yes ___ No ___ Comments _____

2. Did the unit meet the minimum technology requirements (double liner, leachate collection system, and ground-water monitoring)?

   Yes ___ No ___ NA ___ Comments _____

E. Treatment Using RCRA 264/265 Exempt Units or Processes NA

1. Is waste treated in RCRA 264/265 exempt units (i.e., boilers, furnaces, distillation units, wastewater treatment tanks, elementary neutralization, etc.)?

   Yes ___ No ___

   List types of waste treatment units and processes:

Waste Code	Type of Treatment	Treatment Units and Processes

2. Are treatment residuals generated from these units?

   Yes ___ No ___ Comments _____

   If yes, the residues are subject to the LDR generator requirements.

3. Are these residuals further treated, stored for greater than 90 days, or disposed on-site?

   Yes ___ No ___ NA ___ Comments _____

   If yes, the TSD checklist must be completed.

RCRA LAND DISPOSAL RESTRICTION INSPECTION

TRANSPORTER CHECKLIST NA

TRANSPORTER REQUIREMENTS

A. Does the transporter accumulate waste for more than 10 days [268.50(a)(3)]?

Yes ___ No ___

If yes, check the appropriate regulatory status:

____ Interim status for storage
____ RCRA permit for storage

If no, describe inventory controls to ensure that wastes are not stored for more than 10 days:

_____

_____

_____

B. Does the transporter mix, combine, or recontainerize wastes?

Yes ___ No ____

If yes, list the restricted wastes that have been mixed.

_____

_____

_____

C. Is the waste treated in an exempt treatment process on-site?

Yes ___ No ___

RCRA LAND DISPOSAL RESTRICTION INSPECTION

TSD CHECKLIST

TSD REQUIREMENTS

A. General Facility Standards

1. Does the waste analysis plan cover Part 268 requirements [264/265.13]?

F-solvent (TCLP)*	Yes ✓	No ___	NA ___
Dioxin (TCLP)	Yes ___	No ___	NA ✓
California List (PFLT and/or total constituent analysis)*	Yes ✓	No ___	NA ___
First & Second Third (TCLP and/or total constituent analysis)	Yes ___	No ___	NA ✓

* TCLP= Toxicity Characteristic Leaching Procedure (268, App. I)
PFLT= Paint Filter Liquids Test (SW-846)

2. Does the facility obtain representative chemical and physical analyses of wastes and residues?

Yes ✓ No ___ Comments _____

a. What date was the waste analysis plan last revised?
January 29, 1990

b. Are analyses conducted on-site or off-site?

___ On-site ✓ Off-site

Identify off-site lab: Wadsworth Alert

c. Are F-solvent and dioxin containing waste analyzed using TCLP?

Yes ___ No ✓ NA ___

Know F-solvent wastes exceed treatment standards and handle them as restricted wastes.

d. Are California List wastes analyzed using the appropriate analytical method (PFLT filtrate for metals and cyanide; no total constituent analysis for corrosive wastes, PCBs and halogenated organic compounds (HOCs).

Yes ___ No ___ NA ___

e. Are First Third and Second Third wastes analyzed using the appropriate analytical method for the specified BDAT* (i.e., total constituent analysis for destruction technologies and TCLP for stabilization/fixation technologies)? See Appendix B.

Yes ___ No ___ NA ✓

* BDAT= best demonstrated available technology

3. Are the operating records, including analyses and quantities, complete [264/265.73]?

Yes ✓ No ___

4. Do operating records contain copies of the notification, ~~certification~~, and demonstration (if applicable) from the generator? Records must be kept until closure of unit.

Yes ✓ No ___ Comments _____

B. Storage (268.50)

1. Are prohibited wastes* stored on-site?

Yes ✓ No ___ (If no, go to C, Treatment.)

* Prohibited wastes are a subset of restricted wastes, i.e., they are those restricted wastes that are currently ineligible for land disposal [53 FR 31208, August 17, 1988].

2. If yes, identify storage unit.

✓ Tanks
✓ Containers
___ Other (Identify inappropriate storage unit(s)._____

3. Are all containers clearly marked to identify the contents and date(s) entering storage [268.50(a)(2)]?

Yes ✓ No ___ NA ___

4. Do operating records track the location, quantity of the wastes, and dates that the wastes enter and leave storage (264/265.73)?

   Yes ✓ (drums) No ___ (tanks emptied within 30 days)

5. Do operating records agree with container labeling [268.50(a)(2) and 264/265.73]?

   Yes ✓ No ___ NA ___

6. Have tanks been emptied at least once per year since the applicable LDR regulations went into effect?

   Yes ✓ No ___ NA ___

   If yes, do the operating records show that the volume of waste removed from tanks annually equals or is greater than the tank volume?

   Yes ✓ No ___

7. Are all tanks clearly marked with a description of the contents, the quantity of wastes received, and date(s) entering storage, or is such information recorded and maintained in the operating record [268.50(a)(2)]?

   Yes ✓ No ___ NA ___

8. Have wastes been stored for more than 1 year since the applicable LDR regulations went into effect [268.50(c)]?

   Yes ___ No ✓ NA ___

   If yes, can the facility show that such accumulation is necessary to facilitate proper recovery, treatment, or disposal?

   Yes ___ No ___ NA ✓

   If yes, state how: _____

   _____

   _____

9. Has liquid hazardous waste containing PCBs at concentrations greater than or equal to 50 ppm being stored: drum storage

   a. In a facility meeting the TSCA criteria in 761.65(b)?

      Yes ___ No ___ NA ___

   b. More than one year [268.50(f)]?

      Yes ___ No ✓ NA ___

C. Treatment

1. Does the facility treat restricted wastes other than in surface impoundments?

Yes ___ No ✓ (If no, go to D, Surface Impoundments.)

2. Describe the waste codes and treatment processes:

Waste Code	Treatment Processes
_____	_____
_____	_____
_____	_____

3. Was dilution used as a substitute for treatment [268.3]?

Yes ___ No __ Comments _____

4. Does the facility, in accordance with an acceptable waste analysis plan, test the residue from all treatment processes [268.7(b)]?

Yes ___ No ___ Comments _____

Have treatment standards or prohibition levels been met?

Yes ___ No ___ Comments _____

5. Does the facility ship any waste or treatment residue to an off-site disposal facility?

Yes ___ No ___ NA ___

If yes, does the treatment facility provide notification and certification to the disposal facility [268.7(b)(4) and (5)]??

Yes ___ No ___ (If yes, the Generator portion of the checklist must be completed.)

6. If the waste or treatment residue will be further managed at a different treatment or storage facility, has the facility complied with the generator notice and certification requirements [268.7(a)]?

Yes ___ No ___

SD

7. Does the facility treat "soft hammer" wastes?

   Yes ___ No ___ (If no, go to 8.)

   a. If yes, is the waste treated in accordance with the generator's certification/demonstration [268.8(c)(1)]?

      Yes ___ No ___

   b. Did the treatment facility certify that the "soft hammer" waste was treated in accordance with the generator's demonstration, [268.8(c)(1)]?

      Yes ___ No ___

8. Does the facility ship any "soft hammer" waste to an off-site treatment, recovery, disposal or storage facility?

   Yes ___ No ___ NA ___

   If yes, does the treatment facility send a copy of the generator's "soft hammer" demonstration and certification to the receiving treatment, recovery, disposal or storage facility along with its treatment certification [268.8(c)(2)]?

   Yes ___ No ___ NA ___

   Identify waste codes and off-site facilities:

Waste Code	Facility

9. Are notifications, demonstrations, certifications (if applicable), and results of waste analysis prepared by the generators, kept in the operating record until facility closure [264/265.73(b)]?

   Yes ___ No ___

D. Surface Impoundments

1. Are prohibited wastes placed in surface impoundments for treatment?

   Yes ___ No ✓ List _____ (If no, go to E, Land Disposal.)

2. Are evaporation or dilution the only recognizable treatment occurring in the surface impoundment?

   Yes ___ No ___

3. Did the facility submit to the Agency, the waste analysis plan, as well as, the certification of compliance with minimum technology and ground-water monitoring requirements?

   Yes ___ No ___

4. If the minimum technology requirements have not been met, has a waiver been granted for that unit?

   Yes ___ No ___ NA ___

5. Have the Subpart F groundwater monitoring requirements been met?

   Yes ___ No ___ NA ___

6. Are representative samples of the sludge and supernatant from the surface impoundment tested separately, acceptably, and in accordance with the sampling frequency and analysis specified in the waste analysis plan?

   Yes ___ No ___

   Attach test results.

7. Do the hazardous waste residues (sludges or liquids) exceed the treatment standards specified in 40 CFR 268, or where no treatment standards are established for a waste, the applicable prohibition levels?

   Sludge Yes ___ No ___ Waste Code _____

   Supernatant Yes ___ No ___ Waste Code _____

8. Provide the frequency of analyses conducted on treatment residues:

   _____

   _____

   _____

9. Does the operating record adequately document the results of waste analyses performed in accordance with 40 CFR 268?

Yes ___ No ___

10. Are sludge residues that exceed the treatment standards and/or prohibition levels removed adequately on an annual basis?

Yes ___ No ___ Comments _____

a. Are adequate precautions taken to protect liners, and do records indicate that liner integrity is inspected?

Yes ___ No ___

b. Are residues subsequently managed in another surface impoundment?

Yes ___ No ___

c. Are residues treated prior to disposal?

Yes ___ No ___ Comments _____

If yes, are waste residues treated on-site or off-site?

On-site _____ Off-site _____

Identify waste code and treatment method:

Waste Code	Treatment Method
_____	_____
_____	_____
_____	_____

11. If supernatant is determined to exceed treatment standards, is annual throughput greater than impoundment volume?

Yes ___ No ___ Comments _____

E. Land Disposal

1. Are restricted and/or prohibited wastes placed in land disposal units such as landfills, surface impoundments, waste piles, land treatment units, salt domes/beds, mines/caves, concrete vaults, or bunkers?

   Yes ___ No ✓

   Note: Do not include surface impoundments addressed in D, Surface Impoundments.

   If yes, specify which units and what wastes each unit has received:
   _____
   _____
   _____

2. Does the facility's operating record contain notices, certifications, and "soft hammer" demonstrations from generators/storers/treaters? These records must be maintained until facility closure.

   Yes ___ No ___

3. Does the facility obtain waste analysis data or test the wastes (according to the waste analysis plan) to determine that the wastes comply with the applicable treatment standards [268.7(c)]?

   Yes ___ No ___

   If yes, at what frequency? _____
   _____
   _____

4. If prohibited wastes that exceed the treatment standards are placed in land disposal units (excluding wastes subject to national capacity variances) [268.30(a)], does the facility have an approved waiver based on no migration petition [268.6], an approved case-by-case capacity extension [268.5], or variance from treatment standards [268.44]?

   Yes ___ No ___

5. Does the facility dispose of restricted wastes that are subject to a national capacity variance or the "soft hammer" provisions?

   Yes ___ No ___ Comments _____

   If yes, have the minimum technology requirements been met for all units receiving such wastes?

   Yes ___ No ___

6. Does the facility have notices [268.7(a)(3)] and records for disposed wastes that are subject to national capacity variances, case-by-case extensions [268.5], no migration petitions [268.6], or a variance from treatment standards?

   Yes ___ No ___ NA ___

7. If the facility has a case-by-case extension, is the facility making progress as described in progress reports?

   Yes ___ No ___ NA ___

8. Are restricted wastes placed in underground injection wells?

   Yes ___ No ___ List _____

LIST OF RESTRICTED WASTES

CODES:
Asterisk (*) = U.S. EPA has established treatment standards or prohibition levels.
No asterisk = Soft hammer wastes.
Underlined = Potential California List applicability.
Bold Print = Final third and newly listed wastes.
NWW = Non-wastewater
WW = Wastewater

	Gen/Trans/Treat/Store/Disp
F001*	/ / / /
F002*	✓ / / / ✓
F003*	✓ / / / ✓
F004*	/ / / /
F005*	✓ / / / ✓
F020*	/ / / /
F021*	/ / / /
F022*	/ / / /
F023*	/ / / /
F026*	/ / / /
F027*	/ / / /
F028*	/ / / /
Liquid Hazardous Wastes With:	
As* (500 mg/l)	/ / / /
Cd* (100 mg/l)	/ / / /
Cr VI* 490 (500 mg/l)	✓ / / ✓
Pb* (500 mg/l)	✓ / / ✓
Hg* (20 mg/l)	/ / / /
Ni* (134 mg/l)	/ / / /
Se* (100 mg/l)	/ / / /
Tl* (130 mg/l)	/ / / /
pH* ≤ 2.0	/ / / /
PCBs* ≥ 50 ppm	✓ / / ✓
Hazardous Wastes with:	
HOCs* ≥ 1,000 mg/l	✓ / / ✓
≥ 1,000 mg/kg	/ / / /
F006 (NWW)*	/ / / /
(WW)	/ / / /
F007*	/ / / /
F008*	/ / / /
F009*	/ / / /
F010*	/ / / /

	Gen/Trans/Treat/Store/Disp
F011*	/ / / /
F012*	/ / / /
F019	/ / / /
F024*	/ / / /
K001*	/ / / /
K004	/ / / /
K005 (NWW)*	/ / / /
K007 (NWW)*	/ / / /
K008	/ / / /
K009*	/ / / /
K010*	/ / / /
K011(NWW)*	/ / / /
(WW)	/ / / /
K013(NWW)*	/ / / /
(WW)	/ / / /
K014(NWW)*	/ / / /
(WW)	/ / / /
K015(WW)*	/ / / /
K016*	/ / / /
K017	/ / / /
K018*	/ / / /
K019*	/ / / /
K020*	/ / / /
K021(NWW)*	/ / / /
(WW)	/ / / /
K022(NWW)*	/ / / /
(WW)	/ / / /
K023*	/ / / /
K024*	/ / / /
K025(NWW)*	/ / / /
(WW)	/ / / /
K027*	/ / / /
K028*	/ / / /
K029(NWW)*	/ / / /
(WW)	/ / / /
K030*	/ / / /
K031-	/ / / /
K035	/ / / /
K036*	/ / / /

	Gen/Trans/Treat/Store/Disp
K037*	/ / / /
K038*	/ / / /
K039*	/ / / /
K040*	/ / / /
K041	/ / / /
K042	/ / / /
K043*	/ / / /
K044*	/ / / /
K045*	/ / / /
K046 (NWW - nonreactive)*	/ / / /
(NWW - reactive)	/ / / /
(WW)	/ / / /
K047*	/ / / /
K048*	/ / / /
K049*	/ / / /
K050*	/ / / /
K051*	/ / / /
K052*	/ / / /
K060(NWW)*	/ / / /
(WW)	/ / / /
K061 (NWW - low zinc)*	/ / / /
(NWW - high zinc)*	/ / / /
(WW)	/ / / /
K062*	/ / / /
K069	
(NWW - nonCaSO$_4$)*	/ / / /
(NWW - CaSO$_4$)	/ / / /
(WW)	/ / / /
K071*	/ / / /
K073	/ / / /
K083 (WW)	/ / / /
K084	/ / / /
K085	/ / / /

(spill clean up)

	Gen/Trans/Treat/Store/Disp
K086 (NWW - Soi Wash)*	/ / / /
(W... So... ash)*	/ / / /
(NWW - Soi Sludge)	/ / / /
(WW - Soi Sludge)	/ / / /
(NWW - Caustic/Water	/ / / /
(WW - Caustic/Water)	/ / / /
K087*	/ / / /
K093*	/ / / /
K094*	/ / / /
K095 (NWW)*	/ / / /
(WW)	/ / / /
K096 (NWW)*	/ / / /
(WW)	/ / / /
K097	/ / / /
K098	/ / / /
K099*	/ / / /
K100 (NWW)*	/ / / /
K101 (NWW - low As)*	/ / / /
(NWW - high As)	/ / / /
(WW)*	/ / / /
K102 (NWW - low As)*	/ / / /
(NWW - high As)	/ / / /
(WW)*	/ / / /
K103*	/ / / /
K104*	/ / / /
K105	/ / / /
K106	/ / / /
K113*	/ / / /
K114*	/ / / /
K115*	/ / / /
K116*	/ / / /
001	/ / / /
002	/ / / /
003	/ / / /
004	/ / / /

	Gen/Trans/Treat/Store/Disp
P005	/ / / /
P007	/ / / /
P008	/ / / /
P010	/ / / /
P011	/ / / /
P012	/ / / /
P013*	/ / / /
P014	/ / / /
P015	/ / / /
P016	/ / / /
P018	/ / / /
P020	/ / / /
P021*	/ / / /
P026	/ / / /
P027	/ / / /
P029*	/ / / /
P030*	/ / / /
P036	/ / / /
P037	/ / / /
P039*	/ / / /
P040*	/ / / /
P041*	/ / / /
P043*	/ / / /
P044*	/ / / /
P048	/ / / /
P049	/ / / /
P050	/ / / /
P054	/ / / /
P057	/ / / /
P058	/ / / /
P059	/ / / /
P060	/ / / /
P062*	/ / / /
P063*	/ / / /
P066	/ / / /
P067	/ / / /
P068	/ / / /
P069	/ / / /
P070	/ / / /
P071*	/ / / /
P072	/ / / /
P074*	/ / / /
P081	/ / / /
P082	/ / / /
P084	/ / / /
P085*	/ / / /

	Gen/Trans/Treat/Store/Disp
P087	/ / / /
P089*	/ / / /
P092	/ / / /
P094*	/ / / /
P097*	/ / / /
P098*	/ / / /
P099*	/ / / /
P102	/ / / /
P104*	/ / / /
P105	/ / / /
P106*	/ / / /
P107	/ / / /
P108	/ / / /
P109*	/ / / /
P110	/ / / /
P111*	/ / / /
P112	/ / / /
P113	/ / / /
P114	/ / / /
P115	/ / / /
P120	/ / / /
P121*	/ / / /
P122	/ / / /
P123	/ / / /
U002	/ / / /
U003	/ / / /
U005	/ / / /
U007	/ / / /
U008	/ / / /
U009	/ / / /
U010	/ / / /
U011	/ / / /
U012	/ / / /
U014	/ / / /
U015	/ / / /
U016	/ / / /
U018	/ / / /
U019	/ / / /
U020	/ / / /
U021	/ / / /
U022	/ / / /
U023	/ / / /
U025	/ / / /
U026	/ / / /

	Gen/Trans/Treat/Store/Disp			
U028*	/	/	/	/
U029	/	/	/	/
U031	/	/	/	/
U0[illegible]	/	/	/	/
U0[illegible]	/	/	/	/
U036	/	/	/	/
U037	/	/	/	/
U041	/	/	/	/
U043	/	/	/	/
U044	/	/	/	/
U046	/	/	/	/
U047	/	/	/	/
U049	/	/	/	/
U050	/	/	/	/
U051	/	/	/	/
U053	/	/	/	/
U057	/	/	/	/
U058*	/	/	/	/
U059	/	/	/	/
U060	/	/	/	/
U061	/	/	/	/
U062	/	/	/	/
U063	/	/	/	/
U064	/	/	/	/
U066	/	/	/	/
U067	/	/	/	/
U069*	/	/	/	/
U070	/	/	/	/
U073	/	/	/	/
U074	/	/	/	/
U077	/	/	/	/
U078	/	/	/	/
U080	/	/	/	/
U083	/	/	/	/
U086	/	/	/	/
U087*	/	/	/	/
U088*	/	/	/	/
U089	/	/	/	/
U092	/	/	/	/
U093	/	/	/	/
U094	/	/	/	/
U095	/	/	/	/
U097	/	/	/	/
U098	/	/	/	/
U099	/	/	/	/
U101	/	/	/	/

	Gen/Trans/Treat/Store/Disp			
U102*	/	/	/	/
U103	/	/	/	/
U105	/	/	/	/
U106	/	/	/	/
U107*	/	/	/	/
U108	/	/	/	/
U109	/	/	/	/
U110	/	/	/	/
U111	/	/	/	/
U114	/	/	/	/
U115	/	/	/	/
U116	/	/	/	/
U119	/	/	/	/
U122	/	/	/	/
U124	/	/	/	/
U127	/	/	/	/
U128	/	/	/	/
U129	/	/	/	/
U130	/	/	/	/
U131	/	/	/	/
U133	/	/	/	/
U134	/	/	/	/
U135	/	/	/	/
U137	/	/	/	/
U138	/	/	/	/
U140	/	/	/	/
U142	/	/	/	/
U143	/	/	/	/
U144	/	/	/	/
U146	/	/	/	/
U147	/	/	/	/
U149	/	/	/	/
U150	/	/	/	/
U151	/	/	/	/
U154	/	/	/	/
U155	/	/	/	/
U157	/	/	/	/
U158	/	/	/	/
U159	/	/	/	/
U161	/	/	/	/
U162	/	/	/	/
U163	/	/	/	/
U164	/	/	/	/
U165	/	/	/	/
U168	/	/	/	/
U169	/	/	/	/

	Gen/Trans/Treat/Store/Disp			
U170	/	/	/	/
U171	/	/	/	/
U172	/	/	/	/
U173	/	/	/	/
U174	/	/	/	/
U176	/	/	/	/
U177	/	/	/	/
U178	/	/	/	/
U179	/	/	/	/
U180	/	/	/	/
U185	/	/	/	/
U188	/	/	/	/
U189	/	/	/	/
U190*	/	/	/	/
U192	/	/	/	/
U193	/	/	/	/
U196	/	/	/	/
U200	/	/	/	/
U203	/	/	/	/
U205	/	/	/	/
U206	/	/	/	/
U208	/	/	/	/
U209	/	/	/	/
U210	/	/	/	/
U211	/	/	/	/
U213	/	/	/	/
U214	/	/	/	/
U215	/	/	/	/
U216	/	/	/	/
U217	/	/	/	/
U218	/	/	/	/
U219	/	/	/	/
U220	/	/	/	/
U221*	/	/	/	/
U223*	/	/	/	/
U226	/	/	/	/
U227	/	/	/	/
U228	/	/	/	/
U235*	/	/	/	/
U237	/	/	/	/
U238	/	/	/	/
U239	/	/	/	/
U244	/	/	/	/
U248	/	/	/	/
U249	/	/	/	/